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IN REPLY PLEASE REFER TO:

25CMS/004

January 13, 2025

Ms. Mary Alice Evans, Director
Environmental Review Program, Office of Planning and Sustainable Development
Department of Business, Economic Development & Tourism
State of Hawaii
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Subject: Federal NEPA Draft Environmental Assessment Publication for
State HPHA Demolition of David Malo Circle and Piilani Homes Project
Tax Map Keys: (2) 4-6-010:028 and (2) 4-5-007:005
723 Mill St. and 1028 Wainee St., Lahaina, Hawaii, 96761

The State of Hawaii (State), Hawaii Public Housing Authority (HPHA) hereby transmits for publication this National Environmental Policy Act (NEPA) Draft Environmental Assessment (Draft EA) for the Demolition of David Malo Circle and Piilani Homes Project. These housing projects are in Lahaina, Maui, Hawaii and were severely damaged by the Lahaina Wildfire in August 2023. The proposed project may use federal funding provided by the U.S. Department of Housing and Urban Development (HUD). HPHA as the authorized Certifying Officer has subsequently prepared this federal Draft EA for publication and anticipates a Finding of No Significant Impact for this demolition project.

Please publish notice of this Draft EA's availability in the next edition of the Environmental Review Program's *The Environmental Notice*. An electronic PDF copy of this Draft EA document and a Project Location Map have been submitted via the Environmental Review Program's online Submittal Form portal. Should you have any questions or require additional information, please contact Ms. Becky L. Choi, State Housing Development Administrator at (808) 832-6020.

Sincerely,

A handwritten signature in black ink, appearing to read "Hakim".
Hakim Ouansafi
Executive Director

**NEPA Action EA/EIS
Publication Form**

Project Name: Hawaii Public Housing Authority Demolition of David Malo Circle and Piilani Homes Project
Draft Environmental Assessment

Island: Maui

District: Lahaina

TMK: (2) 4-6-010:028 and (2) 4-5-007:005

Permits: N/A

**Applicant or
Proposing
Agency:**

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Approving

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Responsible
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Status: Accepting comments until February 22, 2025 (30-day comment period).

Please submit comments by mail to:
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2153 North King Street, Suite 200
Honolulu, Hawai'i 96819

Or by email to:
rsato@bowersandkubota.com

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

HPHA proposes the demolition of the remaining structures of David Malo Circle and Piilani Homes to allow for the future recovery and reconstruction of these sites. No buildings remain at David Malo Circle except for remaining accessory structures such as light poles, trash enclosures, mailboxes, etc. Five buildings and accessory structures remain at Piilani Homes. The Proposed Action will include the demolition of remnant structures, disposal of demolition debris, soil sampling, removal of contaminated soil, and the stabilization of the sites using gravel or similar materials to prevent erosion. Ash and debris have been removed and surface soil has been scraped, tested, and replaced with gravel by the United State Army Corps of Engineers (USACE) at all building sites which were destroyed by fire at both Project sites. HPHA is evaluating options to reconstruct the 60 total units lost or redevelop for these sites. Therefore, there are no plans established for these housing sites at this time.

Revised February 2012

Hawaii Public Housing Authority Demolition of David Malo Circle and Piilani Homes

DRAFT ENVIRONMENTAL ASSESSMENT

Lahaina, Island of Maui, Hawaii

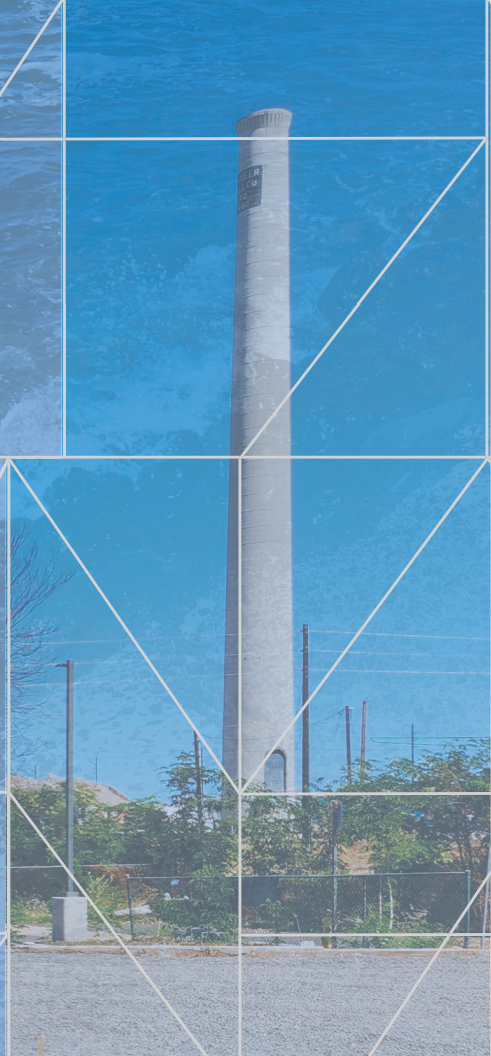
January 2025



HPH Hawaii
Public
Housing
Authority

Lead Agency:
**State of Hawaii, Hawaii Public
Housing Authority**

BK
BOWERS + KUBOTA



Hawaii Public Housing Authority Demolition of David Malo Circle and Piilani Homes

DRAFT ENVIRONMENTAL ASSESSMENT

Lahaina, Island of Maui, Hawaii

January 2025



HA Hawaii
Public
Housing
Authority

Lead Agency:

**State of Hawaii, Hawaii Public
Housing Authority**

BK
BOWERS + KUBOTA

Prepared By:

Bowers + Kubota Consulting

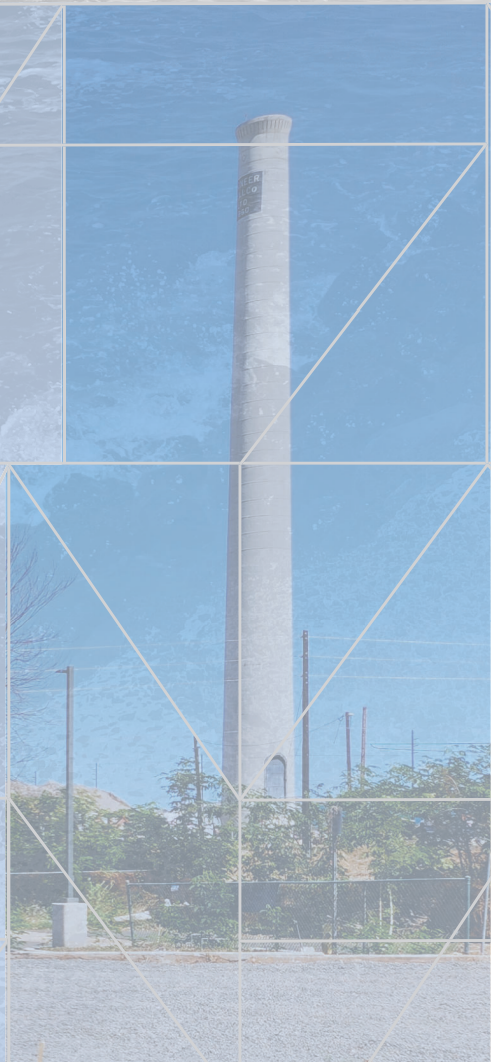


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Appendix C	Preliminary Assessment of Environmental Hazards David Malo and Piilani Housing Developments December 2024 Element Environmental, LLC.
Appendix D	Significance Evaluation for Proposed Demolition of: Piilani Homes, 1028 Waivee Street, Lahaina, Maui, TMK: (2) 4-5-007:005 and David Malo Circle, 723 Mill Street, Lahaina, Maui, TMK: (2) 4-6-010:028 September 2024 Prepared by: Mason Architects, Inc.
Appendix E	ESA Section 7 and EFH Consultation
Appendix F	NHPA Section 106 Consultation

Acronyms and Abbreviations

AAQS	Ambient Air Quality Standards
ALISH	Agricultural Lands of Importance to the State of Hawaii
AMP	Archaeological Monitoring Plan
AMSL	above mean sea level
APE	Area of Potential Effect
AQI	Air Quality Index
ARLS	architectural reconnaissance level survey
BMP	best management practice
CDP	Census-Designated Place
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
County	County of Maui
CWA	Clean Water Act
CWRM	(State DLNR) Commission on Water Resource Management
CZM	Coastal Zone Management
dBA	A-weighted decibels
DLNR	State Department of Land and Natural Resources
DOA	State Department of Agriculture
DOD	Federal Department of Defense
DOH	State Department of Health
DOT	State Department of Transportation
EA	Environmental Assessment
EAL	Environmental Action Levels
EFH	Essential Fish Habitat
EO	Executive Order
ESA	Endangered Species Act
FAI	Fung Associates, Inc.
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FMP	Fishery Management Plan
FONSI	Finding of No Significant Impact
FTA	Federal Transit Administration
FUDS	Formerly Used Defense Sites
GET	General Excise Tax
GHG	greenhouse gas
HAPC	Habitat Areas of Particular Concern
HAR	Hawaii Administrative Rules
HECO	Hawaiian Electric Company
HEER	Hazard Evaluation and Emergency Response
HPHA	Hawaii Public Housing Authority
HRS	Hawaii Revised Statutes
HUD	United States Department of Housing and Urban Development
IPaC	(USFWS) Information for Planning and Consultation
LSB	Land Study Bureau
LUC	Land Use Commission
MASON	Mason Architects, Inc.
MCC	Maui County Code
MGD	million gallons per day

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MSA	Magnuson-Stevens Fishery Conservation Act
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOA	Notice of Availability
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OHA	Office of Hawaiian Affairs
OPSD	Office of Planning and Sustainable Development
PacIOOS	Pacific Islands Ocean Observing System
SHPD	(State DLNR) State Historic Preservation Division
SHPO	State Historic Preservation Officer
SLR-XA	sea level rise exposure area
SMA	Special Management Area
State	State of Hawaii
SWD	(County DEM) Solid Waste Division
TMK	Tax Map Key
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey

CHAPTER 1 INTRODUCTION AND BACKGROUND

The State of Hawaii (State), Hawaii Public Housing Authority (HPHA) is seeking to demolish remaining structures on the sites of the David Malo Circle and Piilani Homes housing developments in Lahaina, Maui, Hawaii. These sites were heavily damaged by the Lahaina Wildfires of August 2023. The demolition of the remaining structures and stabilization of the sites to reduce erosion is necessary in order for HPHA to proceed with rebuilding these housing developments and supporting infrastructure. This project is referred to as the “Demolition of David Malo Circle and Piilani Homes Project” and is hereafter referred to as the “Project”.

On August 10, 2023, President Biden signed a disaster declaration for the State of Hawaii due to damage caused from major wildfires occurring on the Island of Maui which were exacerbated by high winds between August 8 and September 30, 2023. The fires, named Lahaina, Kula, and Olinda, were the most destructive fires in Hawaii’s history, burning over 3,000 acres and severely damaging the Lahaina Town in West Maui. Thousands of Maui residents have been displaced due to the damage.

HPHA manages a total of 60 public housing units in Lahaina between the David Malo Circle and Piilani Homes sites. David Malo Circle consists of 18 units ranging from one to four bedrooms and was first inhabited in 1966. Piilani Homes consists of 42 studio and one-bedroom units and was first inhabited in 1970. These properties are no longer habitable due to irreparable damage from the Lahaina Wildfires in 2023. The purpose of the proposed Project is to conduct demolition and clearing activities to prepare these sites for the future reconstruction of public housing facilities necessary for low-income families and individuals on Maui.

1.1 PURPOSE FOR ENVIRONMENTAL ASSESSMENT

The Project may use federal funding provided by the U.S. Department of Housing and Urban Development (HUD) and HPHA is therefore preparing this Environmental Assessment as the authorized Certifying Officer in accordance with HUD’s environment review procedures under 24 Code of Federal Regulations (CFR) Part 58. HUD’s rules implement the environmental review procedures in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended and the Council on Environmental Quality regulations (40 CFR Parts 1500-1508).

Consequently, this Draft Environmental Assessment (Draft EA) document has been prepared in accordance with these regulations to allow for the use of Federal funds for the necessary demolition and site stabilization at the David Malo Circle and Piilani Homes sites. The proposed Project supports the HPHA’s public purpose of providing quality affordable housing to low-income individuals and managing federal and state public housing programs as well as ongoing recovery and rebuild efforts following the Lahaina Wildfires. Early Consultation comments received as part of the preparation of this Draft EA document are included in Appendix A. Table 1-1 provides a summary of information associated with this Project.

Table 1-1 Summary of Project Information	
Project Name:	Hawaii Public Housing Authority Demolition of David Malo Circle and Piilani Homes Project
Lead Agency: (Certifying Officer)	Hawaii Public Housing Authority State of Hawaii 1002 North School Street Honolulu, Hawaii 96817 Contact: Ms. Becky Choi, State Housing Development Administrator Telephone: (808) 832-6020 Email:becky.l.choi@hawaii.gov
Preparers of Environmental Assessment:	Bowers + Kubota Consulting, Inc. 2153 North King Street, Suite 200 Honolulu, Hawaii 96819 Contact: Mr. Ronald A. Sato, AICP, Senior Project Manager Telephone: (808) 521-5361 Email:rsato@bowersandkubota.com
Project Location:	The parcels proposed for demolition are located in the Lahaina district of the Island of Maui in the State of Hawaii. This town is generally situated along the coast on the west side of the island and is mainly accessed by Route 30, Honoapiilani Highway. The David Malo Circle property is located at the street address 723 Mill Street, north of the Maria Lanakila Catholic church on the northeast side of Honoapiilani Highway. The Piilani Homes site is situated at the street address 1028 Waivee Street, northeast of the Lahaina Center between Honoapiilani Highway and Waivee Street.
Tax Map Key Parcels:	David Malo Circle: (2) 4-6-010:028 Piilani Homes (2) 4-5-007:005
Project Area:	David Malo Circle: 1.56 acres Piilani Homes: 2.45 acres Total: 4.01 acres
Existing Use:	The David Malo Circle and Piilani Homes properties are used to provide public housing facilities for low-income individuals and families. David Malo Circle previously consisted of 18 housing units in eight duplexes that range from one- to four-bedroom units. The Piilani Homes property previously consisted of 42 studio and one-bedroom dwelling units in eight ground-level apartment buildings and a single-story community center. Currently, there are no remaining buildings at David Malo Circle and five remaining buildings at Piilani Homes, with accessory structures such as mailboxes and light poles still remaining at both sites.
State Land Use District:	Urban District (both properties)
Maui Island Plan	Within Urban Growth Boundary (both properties)
West Maui Community Plan Land Use Designation:	David Malo Circle: Transit Oriented Corridor Piilani Homes: Residential
County of Maui Zoning District:	David Malo Circle: R-2 Residential Piilani Homes: A-1 Apartment
Special Management Area:	David Malo Circle: Outside of SMA Piilani Homes: Within SMA
Flood Zone Designation:	Zone X – Areas outside the 500-year floodplain (both properties)

**Table 1-1
Summary of Project Information (Continued)**

Project Summary:	<p>HPHA proposes the demolition of the remaining structures of David Malo Circle and Piilani Homes to allow for the future recovery and reconstruction of these sites. No buildings remain at David Malo Circle except for remaining accessory structures such as light poles, trash enclosures, mailboxes, etc. Five buildings remain at Piilani Homes along with other accessory structures. Demolition and site stabilization will include the demolition of remnant structures, disposal of demolition debris, soil sampling, the removal of contaminated soil, and the stabilization of the sites using gravel or similar materials to prevent erosion. Ash and debris have been removed and surface soil has been scraped, tested, and replaced with gravel by the United State Army Corps of Engineers (USACE) at all building sites which were destroyed by fire at both Project sites. HPHA is still evaluating reconstruction to replace the total 60 units lost or redevelopment options for these sites, therefore, there are no plans established for these housing sites at this time.</p>
-------------------------	--

Background

The State HPHA manages a total of 60 public housing units in Lahaina between the David Malo Circle and Piilani Homes sites that were heavily damaged by the Lahaina Wildfires of August 2023. Consequently, HPHA is proposing the demolition of remaining structures and stabilization of these sites to reduce erosion in order to proceed with rebuilding these housing developments and supporting infrastructure. The Project may use federal funding provided by the U.S. Department of Housing and Urban Development (HUD). HPHA is the authorized by the Governor of the State of Hawaii to serve as the Certifying Officer in accordance with HUD’s environment review procedures under 24 CFR Part 58 to prepare this federal Environmental Assessment under the National Environmental Policy Act (NEPA) of 1969, as amended and the Council on Environmental Quality regulations (40 CFR Parts 1500-1508).

The Hawaii Housing Authority was created in 1935 to provide safe and sanitary housing for low-income residents in Hawaii and was further supported with construction funds made available two years later by the United States Housing Act of 1937. HHA continued to provide housing for Hawaii residents throughout the 1900’s, including for civilians following World War II, for senior citizens following the Government Reorganization Act of 1959, and expanded to a comprehensive approach that would provide programs addressing drugs, crime prevention, education, and job training in the 1990’s. In 1998, the Hawaii Housing Authority was consolidated with the Housing Finance and Development Corporation and was bifurcated in 2005 to create HPHA and the Hawaii Housing Finance and Development Corporation.

HPHA’s current role is to manage federal and state public housing including Housing Choice Vouchers (previously known as Section 8) and senior housing in Hawaii. The HPHA has a responsibility to provide adequate and affordable housing to low-income individuals without discrimination, as provided in §356D of the Hawaii Revised Statutes (HRS). In 2022, HPHA served and housed approximately 45,000 individuals (Hawaii Public Housing Authority, n.d.).

1.2 PROJECT LOCATION

Lahaina is a Census-Designated Place (CDP) located in West Maui, within the Lahaina Moku. Most of Lahaina Town is within the Paunau Ahupuaa, with some of the town located within other ahupuaa such as Moalii, Puehuhunui, and Pahoia. It is bordered on its north by the CDP of Kaanapali and on its south by the CDP of Launiupoko. The proposed Project includes two properties, both near the center of Lahaina Town. The David Malo Circle property is located *mauka* (mountain side) of Honoapiilani Highway and north of the Maria Lanakila Catholic church. The Piilani Homes site is situated northeast of the Lahaina Center between Honoapiilani Highway and Wainee Street. The Lahaina Harbor is located approximately 0.4 miles south of the David Malo Circle site and 0.6 miles south of the Piilani Homes site. Figure 1-1 includes a location map showing the locations of the David Malo Circle and Piilani Homes site in relation to the Town of Lahaina.

Figure 1-2 includes a vicinity map that shows the proposed Project sites and their immediate surrounding area in more detail. Honoapiilani Highway (Route 30), which runs north and south through Lahaina Town, is a State of Hawaii (State) Department of Transportation (DOT), Highways (DOT-HWY) maintained highway. Honoapiilani Highway connects to Kahekili Highway (Route 340) on the northern end of Maui Island and continues around the northern edge of the island into Kahului. Travelling south from Lahaina, Honoapiilani Highway provides access to Wailuku before terminating into South High Street. The David Malo Circle site is accessible via either Dickenson Street or Lahainaluna Road northeast from Honoapiilani Highway and then Mill Street. The Piilani Homes site accessed via Wainee Street, which can be accessed via multiple streets leading *makai* (oceanside or southwest) from Honoapiilani Highway.

The two properties cover a total of approximately four acres of land, with the David Malo Circle property covering approximately 1.56 acres and the Piilani Homes Property covering approximately 2.45 acres. Both properties are owned by the HPHA. However, the buildings and structures are federally owned as they were constructed using federal funds.

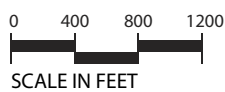
HPHA has a total of six housing developments within Maui County. The Island of Maui has a total of five HPHA housing sites and one housing development is located on the Island of Molokai. Two of Maui island's housing projects are those included in the proposed Project. The other housing projects include Kahekili Terrace (Kihei) and Makani Kai Hale I and II (Wailuku). Of 171 total HPHA units on Maui, 60 are located at the David Malo Circle, TMK (2) 4-6-010:028, and Piilani Homes, TMK (2) 4-5-007:005. Figure 1-3 includes a Tax Map figure identifying these housing sites.

1.3 HOUSING SITES BACKGROUND

1.3.1 David Malo Circle

David Malo Circle was first constructed and occupied in 1966 within the approximately 1.6-acre Tax Map Key (TMK) parcel (2) 4-6-010:028. David Malo Circle was comprised of 18 total units within eight ground-level duplexes with one, two, and three bedrooms per unit and a single two-story duplex with four bedrooms. The housing site is located at 723 Mill Street.

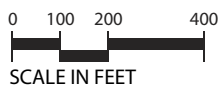
This housing site was previously bordered on the north by commercial uses such as King's Chapel Lahaina and Maui County Federal Credit Union. To the parcel's west was a multi-family housing development and the Sacred Heart School of Lahaina. South of the site was a multi-family development and gas station, and north of the site is an empty lot across Mill Street. The State land use designation for this parcel "Urban" and the County's zoning designation is "R-2 Residential".



**FIGURE 1-1
LOCATION MAP**



Source: Google Aerial Image, August 2023



**FIGURE 1-2
VICINITY MAP**



Source: Google Aerial Image, August 2023

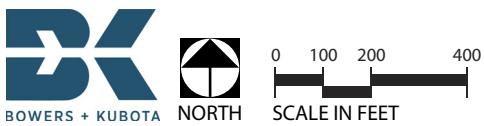


FIGURE 1.3
TAX MAP

1.3.2 Piilani Homes

Piilani Homes was first built and occupied in 1970. Piilani Homes was comprised of 42 total units located throughout eight ground-level apartment buildings. Units were split between studios and 1-bedrooms and included a single-story community center building on the property. The Piilani Homes site is located at 1028 Wainee Street within TMK parcel (2) 4-5-007:005, which is approximately 2.6 acres.

Before the fires, the parcel was bordered on the north and northwest by multi-family housing developments. Commercial uses comprised the southern and eastern boundaries of the site, with Honoapiilani Highway running parallel to the eastern boundary. The State land use designation for the property is “Urban” and the County’s zoning designation is “A-1 Apartment”.

1.4 PURPOSE AND NEED FOR ACTION

1.4.1 Purpose for Proposed Action

The purpose of the Proposed Action (Project) is to assist with the recovery efforts of Maui following the Lahaina Wildfires by preparing the currently inoperable sites of David Malo Circle and Piilani Homes for the future replacement of approximately 60 public housing units. The Project proposes to demolish remnant buildings and accessory structures at both sites which are currently uninhabitable and unusable due to damage from the wildfires. While HPHA is still evaluating reconstruction to replace the total 60 units lost or redevelopment options for these sites, the Proposed Action would allow for HPHA to provide public housing for low-income and elderly individuals and families at these sites as they did before the Lahaina Wildfires.

1.4.2 Need for Proposed Action

The need to demolish the remaining structures at David Malo Circle and Piilani Homes comes from the need to replace and reconstruct the low-income and elderly housing on Maui lost at these sites to the Lahaina Wildfires in 2023. The Proposed Action would additionally support the overall need for housing in the Hawaii, and specifically on Maui, by preparing these sites to be used once again for rental housing. According to the Pacific Disaster Center, a total of 2,207 structures were destroyed, 86% of which were classified as residential (County of Maui, 2023). This has left many Maui residents houseless or in temporary homes until housing on Maui can be rebuilt or replaced. With only four total HPHA sites on Maui, it is essential that these two public housing facilities in Lahaina be restored to provide low-income public housing at a time of uncertainty for residents and when housing is needed. Figure 1-4 and Figure 1-5 shows the David Malo Circle and Piilani Homes sites, respectively, before and after the Lahaina Wildfires.

David Malo Circle and Piilani Homes accounted for 32 studios, 12 one-bedroom, 4 two-bedroom, 10 three-bedroom, and 2 four-bedroom units combined with 42 total studios and one-bedrooms that were reserved for elderly low-income individuals. Currently, both sites are not in a condition for residents to rent or inhabit, therefore, demolition and stabilization of the sites are necessary to begin with reconstruction of housing that can meet the urgent as well as future housing needs of the Lahaina community.

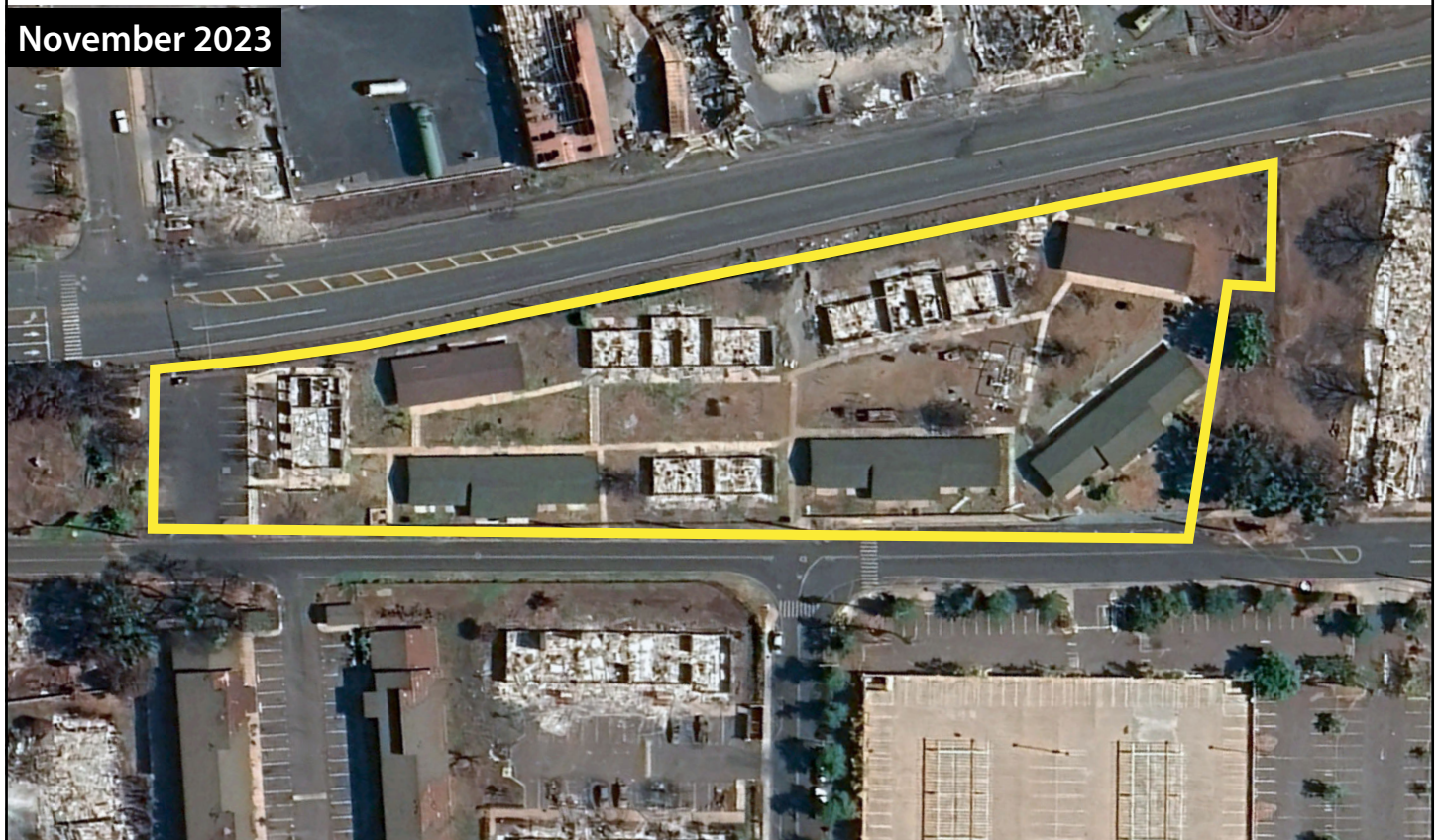
March 2023



January 2024



FIGURE 1-4
DAVID MALO CIRCLE BEFORE AND AFTER FIRE



1.5 SCOPE OF ENVIRONMENTAL ANALYSIS

This EA includes analysis of the potential impacts to the environment associated with the action alternatives. The environmental areas discussed in this EA include geological resources (topography and soils), natural resources (air, water and marine, botanical and faunal, visual), noise, natural and man-made hazards, infrastructure and public facilities, socio-economic environment, and historic and cultural resources.

Some resource areas were considered but not included for detailed analysis because potential impacts would be nonexistent or negligible. The following resource areas and pertinent regulations are addressed below, but were not evaluated further in this EA:

Environmental Justice (Executive Order No. 12898): The Project would be consistent with federal environmental justice requirements under Executive Order 12898. The Proposed Action would not displace any existing residents or result in a disproportionate adverse impact on minority or low-income populations. While these housing sites were for low-income individuals and families, all housing and accessory structures have either been completely destroyed or damaged. As such, both sites are uninhabited, and their demolition would not displace any residents.

The demolition of the David Malo Circle and Piilani Homes sites would allow for the reconstruction or redevelopment of low-income public housing to support elderly or minority individuals that have since been displaced by the damages caused by the wildfire. HPHA is still evaluating options that could include the potential to provide more units with these housing projects for Maui residents than were previously existing on these sites. The eventual construction of this housing would have a beneficial effect on low-income and minority populations within the State by providing them with residences, amenities, and supportive facilities.

Coastal Barrier Resources (16 USC 3501): The State of Hawaii does not have any designated coastal barrier resource units based upon review of the U.S. Fish and Wildlife Services (USFWS) Coastal Barrier Resources System Mapper (United States Fish & Wildlife Service, n.d.). Thus, this project is compliant with the Coastal Barrier Improvement Act of 1990.

Airport Clear Zones and Accident Potential Zones (24 CFR Part 51D): The Kahului Airport (OGG) is the primary civilian airport on the island of Maui and is located on the northern coast in the community of Kahului. Airfields at OGG consist of two runways identified as Runways 2-20 and 5-23. The Project areas are located in the town of Lahaina, approximately 15 miles west of OGG. Therefore, the Proposed Action is not located within 2,500 feet of a civilian airport and is not within a Runway Protection Zone (RPZ) or a Runway Clear Zone (RCZ). There are no military airports on the island of Maui. Therefore, the Project is not sited within 15,000 feet (2.84 miles) of an active military airport or within a military airfield Clear Zone (CZ) or Accidental Potential Zone (APZ). The Proposed Action will not involve any construction or new development and will demolish existing structures. Thus, the Project will not impact clear zones or protection zones and would not require mitigative measures.

Explosive and Flammable Operations (24 CFR Part 51C): There are no known above-ground explosive or flammable material storages of 100 gallons or more present at either site based on site inspections conducted in 2021 for David Malo Circle and 2023 for Piilani Homes (HHF Planners, 2021; HHF Planners, 2023). An approximately 30,000-gallon liquid propane gas above ground storage tank was identified east of the Piilani Homes property during the field inspection. Based on aerial imagery, this tank is still in existence on TMK parcel (2) 4-5-

007:020 and is owned by The Gas Company. The property also stores mobile fuel conveyance tanks. According to CFR Title 24, Part 51, Subpart C, only stationary containers are subject to Acceptable Separation Distance (ASD) requirements. The Proposed Action would not increase the residential density or number of people residing at either property and will only demolish structures and stabilize the sites. Therefore, the Proposed Action would be compliant with 24 CFR Part 51C.

Farmlands Protection (7 CFR Part 658): The Farmlands Protection Policy Act is intended to minimize the impact of Federal programs on the unnecessary and irreversible conversion of farmland to nonagricultural uses. The Proposed Action involves no acquisition of property or major construction that would convert or adversely impact agricultural lands. Neither property contains lands identified for agricultural use by State or County Zoning, the Land Study Bureau (LSB), or Agricultural Lands of Importance to the State of Hawaii (ALISH), as discussed further in Chapter 3. Thus, the Proposed Action would be compliant with 7 CFR Part 658.

Sole Source Aquifer (40 CFR PART 149): The United States Environmental Protection Agency's (USEPA) Sole Source Aquifer Program was established as part of the Safe Drinking Water Act and provides criteria for identifying critical aquifers and protections for groundwater quality. Sole source aquifers provide 50 percent or more of a community's drinking water. Based on the USEPA Pacific Southwest, Region 9 groundwater information, the entire island of Maui does not have a designated sole source aquifer (United States Environmental Protection Agency, 2015). The nearest sole source aquifer is located on the island of Molokai. Thus, the Proposed Action would not impact a sole source aquifer, or its water quality and the Project would be consistent with sole source aquifer Federal regulations.

Wild and Scenic Rivers (16 USC 1271, SECTION 7 (B), (C)): The Wild and Scenic Rivers Act of 1968 established the National Wild and Scenic Rivers System and authorized Congress to preserve rivers with special natural, cultural, or recreational value for the enjoyment of present and future generations. There are no Wild and Scenic Rivers within the State of Hawaii as designated by the National Park Service. Therefore, the proposed demolition would not affect any designated wild and scenic rivers, and the Project would be compliant the Wild and Scenic Rivers Act.

Noise Abatement and Control (24 CFR PART 51, SUBPART B): The CFR sets noise standards as established by HUD for the purpose of minimizing noise pollution by Federal departments and agencies. Both housing sites are situated along Honoapiilani Highway (Route 30), a County four-lane, two-way principal arterial roadway which accommodates motor vehicle traffic entering, leaving, and traveling through the town of Lahaina. During previous site visits conducted when the properties were inhabited, no significant noise generating sources were identified within either property. The sole source of noise at either was traffic noise generated from vehicles traveling along Honoapiilani Highway. Noise from traffic was not identified as being significant and buildings on each site receiving different levels of noise depending on location and proximity to the highway. Additionally, the David Malo Circle housing property features a concrete sound barrier along Honoapiilani Highway to reduce noise received at the site.

The Proposed Action may increase noise generation on both sites from the use of demolition equipment which will be reduced with noise reduction best management practices (BMPs). Additionally, actual sound levels on site may vary depending on traffic volume and nearby construction or demolition activities. Current site conditions at both sites and nearby properties generally do not include inhabitants or sound receivers, as recovery and rebuild efforts are

ongoing. Neither site will be used for housing residents until redevelopment of the site has been completed. As such, the Proposed Action would be in compliance with Federal noise abatement and control regulations.

1.6 RELEVANT LAWS AND REGULATIONS

This EA has been prepared based upon federal and state laws, regulations, statutes, and policies that are pertinent to the implementation of the Proposed Action. These laws and regulations include the following:

- NEPA (42 USC, 4321-4370h), which requires an environmental analysis for major federal actions that have the potential to significantly impact the quality of the human environment,
- CEQ regulations for Implementing the Procedural Provisions of NEPA (40 CFR, 1500-1508),
- HUD Section 18 requirements for demolition and disposal of public housing,
- Clean Air Act (42 USC, 7401 et seq.)
- Clean Water Act (33 USC, 1251 et seq.)
- Coastal Zone Management Act (CZMA) (16 USC, 1451, et seq.)
- Contamination and Toxic Substances (24 CFR Part 50.3 & 58.5(l)(2))
- National Historic Preservation Act (NHPA) (16 USC, 470, et seq.)
- Native American Graves Protection and Repatriation Act of 1990 (NAGPRA)
- Endangered Species Act (ESA) (16 USC part 1531 et seq.)
- Marine Mammal Protection Act (MMPA) (16 USC, 1361 et seq.)
- Migratory Bird Treaty Act (MBTA) (16 USC, 703-712 et seq.)
- Floodplain Management (Executive Order (EO) 11988, 24 CFR Part 55)
- Flood Insurance (42 USC 4001-4128 and 42 USC 5154a)
- Federal Compliance with Pollution Control Standards (EO 12088)
- Protection of Children from Environmental Health Risks and Safety Risks (EO 13045)
- Wetlands Protection (Executive Order 11990)

1.7 ENVIRONMENTAL PERMITS AND AGENCY CONSULTATIONS

Table 2-1 summarizes the potential permits, approvals, and required consultations HPHA or its contractors may need to complete or obtain prior to constructions.

Chapter 343, HRS & Title 11-200.1, HAR (Environmental Review Program)

The HPHA has determined two types of actions which are generally considered exempt from the preparation of an Environmental Assessment. Part 1 actions are considered “de minimis” actions that do not have the potential to adversely affect the environment and include six types of actions (Environmental Advisory Council, 2023). The Proposed Action includes only demolition and site stabilization activities, which are classified under the Type 6 action of demolishing structures except those listed on the national or State Register of Historic Places. This type of action is defined to include buildings and structures, equipment, site improvements, infrastructure and utilities. As such, the proposed Project would be eligible for an exemption from the preparation of a HRS Chapter 343 Environmental Assessment under HAR Title 11, Chapter 200.1.

Table 1-2 Environmental Permits or Consultations	
Oversight Agency	Permit, Approval, or Consultation
U.S. Department of the Interior, Fish and Wildlife Service U.S. Department of Commerce, National Marine Fisheries Service	<ul style="list-style-type: none"> Section 7 Informal Consultation; Endangered Species Act
U.S. Department of Commerce, National Marine Fisheries Service	<ul style="list-style-type: none"> Essential Fish Habitat (EFH) Consultation under Magnuson-Stevens Fishery Conservation and Management Act
State of Hawaii Environmental Council	<ul style="list-style-type: none"> Hawaii Revised Statutes Chapter 343 Exemption
State of Hawaii, Department of Land and Natural Resources, State Historic Preservation Division	<ul style="list-style-type: none"> Section 106 Consultation; National Historic Preservation Act Hawaii Revised Statutes Chapter 6E
State of Hawaii, Department of Health, Clean Water Branch	<ul style="list-style-type: none"> National Pollutant Discharge Elimination System (NPDES) Permit (if more than 1 acre of land is disturbed by construction activities)

County Special Management Area

The Coastal Zone Management (CZM) Act was enacted by Congress in 1972. In 1977, the Hawaii State Legislature passed the Hawaii Coastal Zone Management Act, giving Counties the authority to establish Special Management Areas to regulate shoreline development in the interest of preserving, protecting, and restoring cultural and natural resources in the coastal zone.

The Piilani Homes parcel is located within the County of Maui’s (County) Special Management Area (SMA). Development actions on this parcel would typically require compliance with State environmental regulations as part of the County’s SMA procedures prescribed under the Maui Planning Commission Chapter 202 (Special Management Area Rules). Under the County’s SMA rules, actions which are not defined as “development” pursuant to HRS Chapter 205A-22 are exempt from these requirements based upon the assessment and determination of the County Planning Director. Under HRS Chapter 205A-22 “Development” is defined as (1) any of the uses, activities, or operations on land or in or under water within a special management area, and (2) does not include (G) demolition or removal of structures, except those structures located on any historic site as designated in national or state registers. Neither Project site is listed on the State or National Historic Registers, nor do they have historic qualities which contribute to the Lahaina Historic District. Thus, work for the Proposed Action is exempt from requiring a SMA Permit.

Governor’s Proclamation Relating to Wildfires

On December 6, 2024, Governor Josh Green signed the Nineteenth Proclamation Relating to Wildfires. The proclamation invokes and suspends several rules and regulations with the purpose of assisting and expediting recovery from the wildfires. The proclamation continues in effect until February 4, 2025, unless it is terminated or superseded by another proclamation. The suspension of laws relevant to the Proposed Action are summarized below.

- **HRS, Chapter 6E on historic preservation** is suspended to the extent necessary to (1) allow for emergency demolition, removal, and disposal of wildfire-generated debris; and (2)

allow for the construction or erection of temporary housing for use by displaced victims of the Lahaina wildfires, provided that construction or erection of temporary housing may commence after consultation with, and upon the approval of, the State Historic Preservation Division. Work performed under this suspension is subject to cultural, historic, and archaeological monitoring as appropriate. This suspension includes the order State agencies and personnel to protect and preserve items of historic or cultural significance to the town and historic character of Lahaina regardless of age and in consultation with the State Historic Preservation Division (SHPD).

- **HRS, Chapter 205A on coastal zone management** is suspended to the extent necessary to respond to the emergency, including the reconstruction of previously existing multi-family residences that were destroyed by the Lahaina Wildfire; provided the reconstruction does not change the structure's previous footprint and/or overall dimensions. Minor changes that do not have a substantial negative impact on the Special Management Area may be permitted with approval of the Maui County Planning Director. The proclamation excludes shoreline parcels as defined by the Maui County Planning Department. The proclamation includes single-family residences with structures less than 7,500 square feet cumulative within the lot, or 3,500 square feet per structure for properties within the Lahaina National Historic Landmark District.

The Governor's Proclamation Relating Wildfires would apply to the Proposed Action, as it would demolish, remove, and dispose of wildfire-generated debris and would not add any structures or expand building footprints.

1.8 PUBLIC PARTICIPATION

HPHA conducted consultations under Section 106 to address project effects on historic properties. Consultation was conducted with the State Historic Preservation Division (SHPD) and Early Consultation notifications were sent to the Historic Hawaii Foundation, State Office of Hawaiian Affairs (OHA), other interested parties, and the public.

This Draft EA was prepared considering comments received from an Early Consultation period and a Section 106 consultation on historic resources. The Draft EA will be published in the State Office of Planning and Sustainable Development's (OPSD) Environmental Review Program (ERP) and the U.S. Department of Housing Urban Development's (HUD) HUD Environmental Review Online System (HEROS) and will be open to a 30-day public comment period.

The Early Consultation period was initiated on September 6, 2024, and remained open for approximately 30 days to gather information about the Project area. Early Consultation packages with supporting project information and documentation were sent to various agencies and parties to request their comments on the proposed Project. The Early Consultation for the proposed Project is further discussed in Chapter 5 and comment letters received during the Early Consultation period are included in Appendix A.

CHAPTER 2 PROPOSED ACTION AND ALTERNATIVES

This chapter discusses the Proposed Action, also identified as the “Project”, and alternatives that were considered, including a No Action Alternative and a summary of the potential environmental consequences associated with each. These alternatives were identified in accordance with NEPA’s Council on Environmental Quality (CEQ) regulations for implementing NEPA. Under these regulations, only alternatives that are determined to be financially and technically reasonable relative to their ability to fulfill the purpose and need of the Proposed Action require detailed analysis.

Given the nature of the Project purpose and site conditions, there were no other feasible or practical alternatives to demolishing remaining structures at these housing sites. Demolishing remaining structures at these sites are needed to provide a clean and useable site to allow for their reconstruction or redevelopment. Therefore, only the No Action Alternative is included.

2.1 PROPOSED ACTION

The Proposed Action would involve demolishing the remaining structures at both the David Malo Circle and Piilani Homes and removing any ash, debris, or other material that remain following demolition activities and then stabilizing the site. Figure 2-1 includes a figure identifying demolition activities for David Malo Circle and Figure 2-2 identifies activities for Piilani Homes. Structures to be demolished and removed include trash enclosures, light poles, mailboxes, curbs, and other miscellaneous facilities such as guard rails, metal bars, etc. The intent is to provide an open and clean site that can be used for reconstruction of housing units. Some site work may be needed to grub remaining vegetation that has grown back since the wildfire event, conduct minor grading as needed, or remove existing driveway asphalt or concrete walkways.

The United States, Department of Army, Corps of Engineers (USACE) in cooperation with other federal agencies have already completed the debris removal and site stabilization associated with the foundations of buildings at these two housing sites destroyed by the wildfire (Exhibit 2-1). This federal effort is being performed for other properties damaged by the wildlife that have chosen to participate in this cleanup effort. Debris removal included dampening the material and wrapping it in industrial wrap before transporting it to the designated debris landfill site.

Following removal of ash and debris, approximately 3 to 6 inches of soil was scraped from beneath the ash. Soil samples were then collected from the scraped areas and analyzed for heavy metals in order to determine if all fire-impacted soil had been removed. If analytical results for the soil samples indicated remaining elevated concentrations of any of the target metals, the soil scrape, sample and test process was repeated until results



Exhibit 2-1 USACE Debris Removal Support Sign at David Malo Circle.

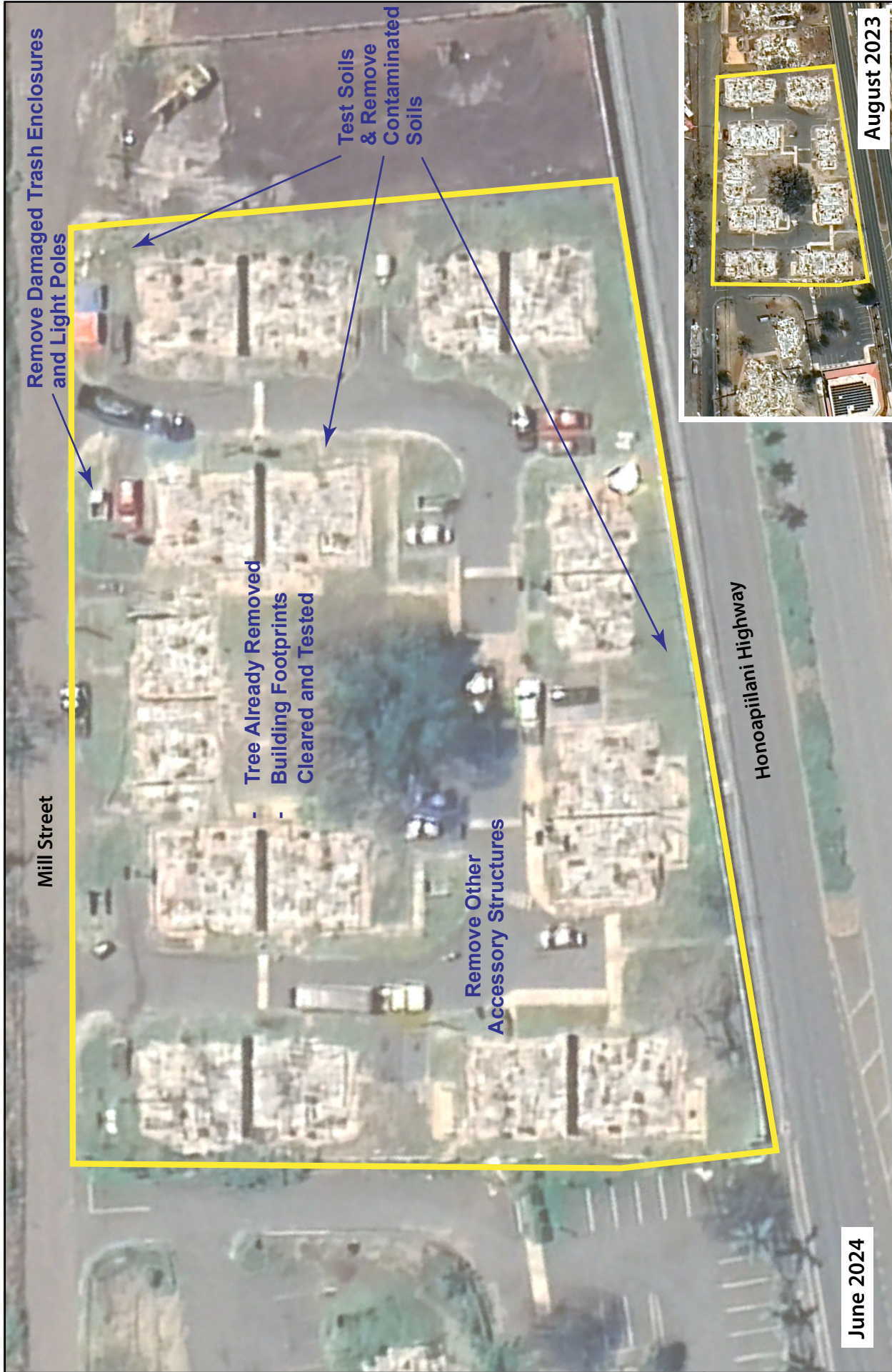
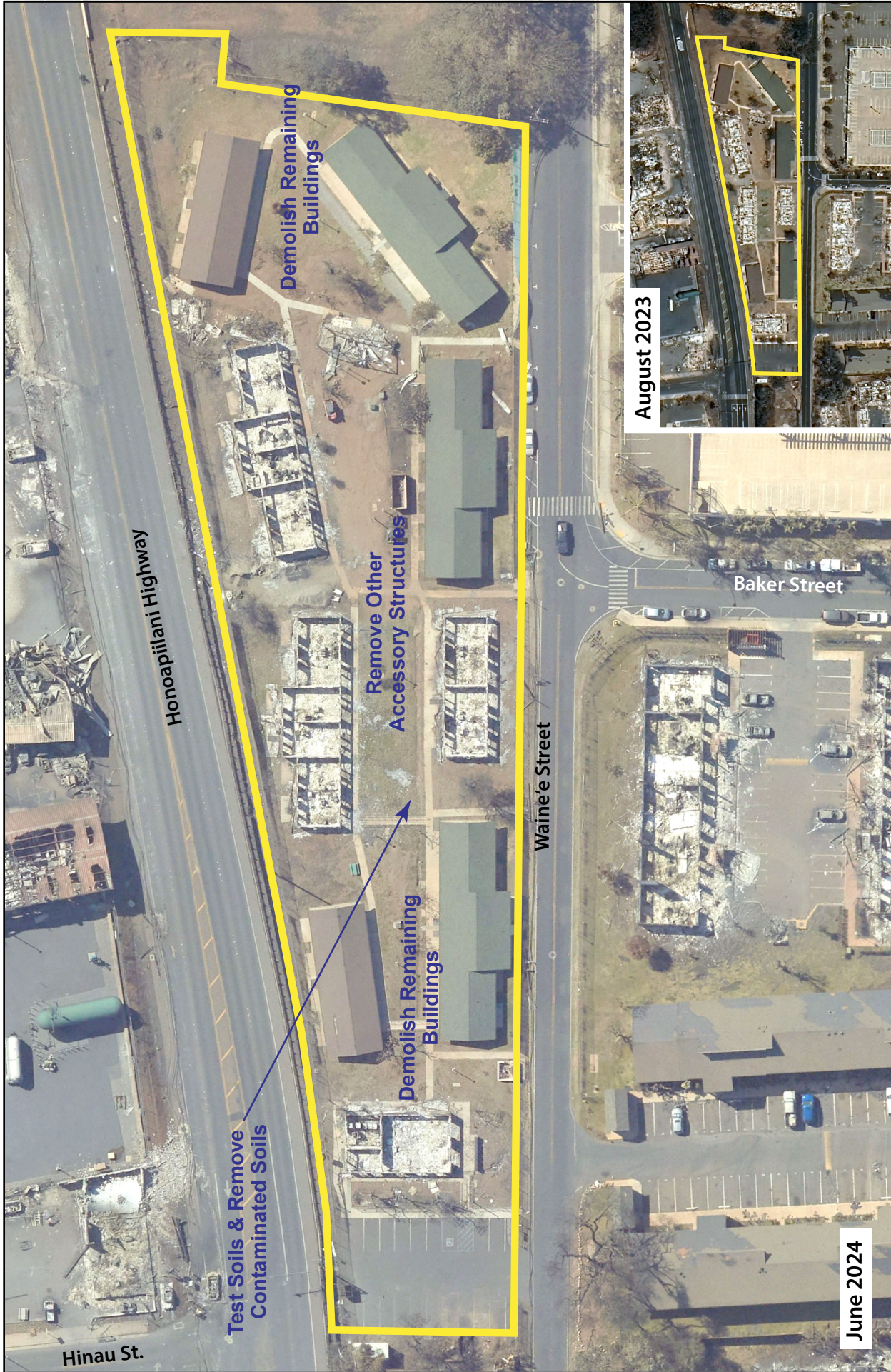


FIGURE 2-1
DAVID MALO DEMOLITION ACTIVITIES



**FIGURE 2-2
PIILANI HOMES DEMOLITION ACTIVITIES**

indicated that the soil did not contain concentrations of metals exceeding State Department of Health (DOH), Hazard Evaluation and Emergency Response (HEER) Environmental Action Levels (EALs). The site was then stabilized using gravel or other material to prevent erosion. The project would generally follow these procedures for unpaved areas remaining on the housing sites consisting of scraping and testing soils as needed to remove heavy metals not meeting DOH EALs.

David Malo Circle Demolition Activities

Although all residential buildings were destroyed by the wildlife at this housing site, there are other remaining structures still present that need to be removed. These include light poles, concrete trash enclosures, and handrails. Vegetation consisting of various weeds has since started growing back on the site. There are several grassed areas on the site that would need to be scraped and tested for the need to remove heavy metals not meeting DOH EALs.

Exhibit 2-2 includes a couple site photos (taken in September 2024) showing these remaining structures along with existing site conditions. Appendix B includes additional site photos showing current conditions. The aerial basemap used in Figure 2-1 was taken in June 2024 before the debris clearing effort was completed by the USACE and it should be noted the single tree present on the site has been cleared (see Photo 2).



Piilani Homes Demolition Activities

Within the Piilani Homes development, three of the apartment buildings, the community center, and a pavilion were destroyed by the fire. There are five unoccupied buildings remaining on the site that were not totally destroyed by the wildlife like the other buildings as shown Figure 2-2. These buildings would be demolished under this project to allow the entire site's reconstruction. Prior to their demolition, these remaining buildings would be inspected for potential damage to building materials that could be hazardous (e.g., asbestos containing materials, lead-based paint, damaged PCB-containing light ballasts, etc.) and properly removed if needed.

There are other remaining structures still present that need to be removed. These include light poles, mailboxes, handrails, etc. Vegetation consisting of various weeds has since started growing back on the site. There are several grassed areas on the site that would need to be scraped and tested for the need to remove heavy metals not meeting DOH EALs.

Exhibit 2-3 includes a couple site photos (taken in September 2024) showing these remaining structures along with existing site conditions. Appendix B includes additional site photos showing current conditions. The aerial basemap used in Figure 2-2 was taken in June 2024 before the debris clearing effort was completed by the USACE.



Project Timeframe and Estimated Costs

Once the environmental review process is completed, the next phase of this project is to complete demolition design plans and obtain ministerial permits so the project can be put out to bid. This environmental review process is projected to be completed by Spring 2025. The demolition work is projected to start by the Summer 2025 and be completed within approximately six months (end of 2025).

The estimated costs for the demolition work are approximately \$2.0 million. Federal funding may be used for the project's demolition work that would consist of various types of available HUD grants such as a Community Planning and Development, Public Housing Capital Fund, or others. HPHA will coordinate with HUD to obtain the release of federal funds at the appropriate time.

2.2 NO ACTION ALTERNATIVE

The No-Action Alternative would leave the remaining structures damaged and in disrepair on both housing sites because it would involve no demolition, soil testing and remediation, and site stabilization. Under consideration of achieving the Proposed Action's purpose and need, this alternative was determined to be unfeasible and impractical due to its inability to provide replacement housing or to further the health and safety conditions of the sites. The No Action Alternative would not meet the project's purpose and need to allow HPHA to reconstruct the lost housing units at this site and provide needed housing for low-income families and individuals. This alternative also does not support HPHA's agency mission to provide low-income families and individuals with available housing.

These two housing sites would remain unused, and structures would further deteriorate potentially creating public safety concerns. HPHA cannot use remaining buildings at Piilani Homes due to the damage caused to units, buildings, and the site, creating potential public safety issues associated with hazardous materials. Undeveloped areas need to be tested following the procedures implemented by

the USACE for debris removal to ensure the site is safe for individuals and the public. Remaining structures also restrict HPHA’s ability to reconstruct facilities or redevelop the property to increase housing units for low-income families and individuals.

This alternative would not be implemented; however, it is carried through the EA analysis to satisfy CEQ requirements. This alternative represents a future scenario “without the project” that provides a baseline of future environmental conditions to assess and evaluate probable impacts or changes resulting from the Proposed Action.

2.3 ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED ACTION AND ALTERNATIVES

Table 2-1 summarizes the environmental consequences of the Proposed Action and the alternative actions evaluated in this assessment. The information in the table is discussed in greater detail in Chapter 3 Existing Environment and Environmental Consequences.

Table 2-1 Summary of Environmental Consequences		
Resource or Issue (Section in EA)	Proposed Action (Demolition)	No Action Alternative
3.1 Geology, Topography, and Soils	The Proposed Action would have minimal to no impacts on geology, topography, or soils as both sites have been previously developed and there is no major cut or fill activities proposed for the demolition. No significant importing or exporting of soil is expected unless soils within the Project sites are found to be contaminated, in which case the contaminated soils will be removed and be replaced with clean gravel. Best management practices (BMPs) will be implemented throughout the Proposed Action to minimize short-term effects related to soil erosion and sedimentation.	No change to existing conditions. No soil sampling would occur and potential contaminations of soil on sites would remain.
3.2 Natural and Man-Made Hazards	The risk of potential damage to both sites from tsunamis, floods, hurricanes, or lava flows would not change, as the action does not change the properties’ locations, add structures or impermeable surfaces, or include grading that would increase these risks. Earthquake hazards would be reduced with the Proposed Action, as remaining structures would be demolished and removed. Hazardous material risk would be similarly reduced, as the Proposed Action would test for contaminated soils and remove them.	No change to existing conditions. No soil sampling would occur and potentially hazardous contaminations of soil on sites would remain.
3.3 Air Quality	There are no long-term impacts on air quality in the area expected. Minor short-term impacts will be minimized through implementation of a dust control plan and BMPs. Potential impacts would be further limited due to the lack of inhabitants in and around Lahaina Town.	No change to existing air quality conditions.

3.4 Noise	The Proposed Action has no anticipated impacts on long-term impacts on ambient noise levels. Minor short-term impacts from demolition-related activities will be minimized through the implementation of BMPs and lack of inhabited residences in the area.	No change to existing ambient noise conditions.
3.5 Terrestrial Resources	No significant short- or long-term impacts to listed terrestrial species are anticipated as there are no identified critical habitats within either Project site. Minimization measures would be implemented for those species which are not expected to but may occur near the Project sites.	No change to existing conditions.
3.6 Visual Resources	No impacts to visual resources are expected, as the Proposed Action does not include vertical construction and there are no identified significant view planes or sightlines identified in the Project area.	No change to existing visual resources.
3.7 Land Use Compatibility	No significant impact on land uses is anticipated, as the Proposed Action does not change existing land uses.	No change to existing land uses.
3.8 Infrastructure Facilities	The proposed Project should not result in negative impacts on any existing infrastructure facilities. The Proposed Action will not create any additional demand for water or wastewater services from the County. The Proposed Action will not include the addition of impermeable surfaces, would likely remove some existing impermeable surfaces, and would comply with NPDES and stormwater management requirements. The Proposed Action will not create demand for long-term solid waste disposal services and short-term solid waste will be disposed of in accordance with recommendations from the County Department of Environmental Management (DEM). Additional demand for electrical or communications systems would not be created, and access to any Hawaiian Electric Company-owned facilities would be retained. Earthmoving activities will not occur where there is existing gas line infrastructure. The Proposed Action does not include additional housing or uses that would create additional demand for roadway uses but will have short-term impacts during construction hours via necessary demolition equipment and staffing.	No change to existing infrastructure facilities.

3.9 Public Facilities	There are no anticipated impacts to recreational as there are no recreational facilities near the Project areas and any potential impacts that may occur from fugitive dust, noise, etc. would be minimized using BMPs. The Proposed Action does not add housing or affect population or population density that would increase demand for educational facilities, police and fire protection, or medical and social services. The Proposed Action would be expected to produce a minor beneficial impact by to social services by preparing the subject properties to provide public housing in the future.	No change to existing public facilities. The Project sites would remain damaged and public housing that existed on the properties would remain missing.
3.10 Socio-Economic Environment	The Proposed Action will not impact the existing population or demographic characteristics of the area as no residents would be displaced and no housing units would be added. Economic impacts such as tax revenue and job creation would be positive but minimal, as short-term jobs would be created for the Project. Positive long-term effects can be expected, as the intent of the Project is to prepare these sites to replace affordable housing which was lost to the Lahaina Wildfires.	No change to existing socio-economic environment. Approximately 60 affordable and elderly public housing units would remain missing.
3.11 Groundwater Resources	The Proposed Action does not include the addition of uses which would increase the long-term water demand at either property. The proposed Project includes processes to test for and remove hazardous materials, which may have positive long-term impacts on groundwater resources if hazardous materials are found.	No change to existing conditions. Soil sampling and removal would not occur, leaving the possibility for groundwater intrusion of hazardous materials if they are present.
3.12 Surface Waters and Water Quality	The proposed Project is not anticipated to negatively impact surface waters or water quality, as there are no streams or identified wetlands within or adjacent to either property and BMPs would be implemented to manage erosion and pollution from stormwater runoff. The Proposed Action would have positive impacts on surface waters and water quality if hazardous materials are found to be present in soils and are removed.	No change to existing conditions. Soil sampling and removal would not occur, leaving the possibility for stormwater runoff to carry hazardous materials if they are present.
3.13 Marine Resources	The Proposed Action should not have negative impacts on marine resources, as the Project properties are located inland from the shore and does not add uses that would increase tourist visitation or recreational activity. Additionally, the Proposed Action would not increase the potential for increased stormwater runoff and would remove any potentially hazardous materials. Consultation	No change to existing conditions.

	with the USFWS and the National Marine Fisheries Services (NMFS) has been initiated and included in this document.	
3.14 Historic and Cultural Resources	Based on updated findings and Section 106 consultations, the Proposed Action should have “no adverse effect” on historic properties, as neither Project site is currently eligible for the National Register of Historic Places (NHRP). If the Proposed Action requires ground disturbance, an archaeological monitoring plan along with any other necessary documentation would be implemented with approval from SHPD. With neither site being eligible for the NRHP and the proposed minimization measures for potential subsurface archaeological resources, the Proposed Action should not adversely affect historic or archaeological resources.	No change to existing site conditions. Neither site is eligible for the NHRP.
3.15 Secondary and Cumulative Effects	The Proposed Action should not contribute to significant secondary or cumulative impacts. Temporary minor cumulative impacts from demolition activities such as fugitive dust and noise could occur. These impacts would be minimized due to most residences and businesses in Lahaina being uninhabited and through implemented BMPs.	No change to existing site conditions.
3.16 Unavoidable Adverse Effects	There are no adverse environmental impacts identified that cannot be avoided or mitigated.	No change to existing conditions.

CHAPTER 3 EXISTING ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes the existing natural environment, and resources present within the Project areas. The chapter will discuss likely impacts of the Proposed Action, the no action alternatives, and minimization measures that would reduce adverse impacts.

Climate

Climate on the Island of Maui, as well as within the State of Hawaii, is characterized by relatively stable year-round weather with low day-to-day and month-to-month variability. Differences in the climates of various areas are generally attributable to the island's geologic formation and topography which result in microclimates ranging from tropical rain forests to dryer plains depending on attributes of the local environment such as elevation and prevailing wind. There are generally two seasons recognized in Hawaii, with summer occurring in the months of May through October, and winter occurring in the months of October through April. Summer months tend to yield higher temperatures and drier conditions, and winter months tend to be cooler with more frequent rainfall.

Northeasterly trade winds are predominant throughout the year for the entire state due to semipermanent atmospheric eddies, with southerly or westerly winds becoming more frequent during the winter as "Kona" storms generate winds from the south. Windward, or northeasterly-facing, sides of the islands tend to receive more year-round rainfall while leeward, or southwesterly-facing, sides of the islands tend to be drier and rely on winter storms to bring rainfall. Northeast trade winds typically occur during the day, while winds from the southwest typically occur during the night due to cold air drainage from the mountains (National Oceanic and Atmospheric Administration, n.d.).

The Project areas are located in Lahaina on the leeward side of the Island of Maui. Average annual temperatures on Maui range from 45 degrees Fahrenheit (°F) in higher elevation mountainous regions to 75°F in lower elevation and coastal regions. In Lahaina, the average annual temperature is approximately 75°F, with average monthly temperatures fluctuating by approximately 7 degrees between summer and winter months and approximately 10 degrees between day and night. Average wind speeds for the area range from lows of approximately 2 miles per hour (mph) up to highs of 9 mph (Giambelluca, et al., 2014). Average annual rainfall in Lahaina is approximately 13.5 inches per year, with less than one inch per month occurring between April and October. This is slightly drier than Kahului, which receives approximately 16 inches of rain annually, and much drier than Hana, which receives approximately 69 inches annually (Giambelluca, et al., 2013).

3.1 GEOLOGY, TOPOGRAPHY, AND SOILS

3.1.1 Affected Environment

Geology

The Island of Maui is the second largest of the State's eight major islands and has a total area of approximately 727 square miles. Maui is the second youngest in the Hawaiian Archipelago with rocks from its earliest volcano indicating an age of at least 1.29 million years. In contrast, Kauai is over 5 million years old. Two shield volcanoes formed the Island of Maui: Haleakala, and the West Maui Volcano which consisted of the Wailuku, Honolua, and Lahaina Volcanics (Sinton, n.d.). The geology of the Project area mainly consists of Holocene and Pleistocene alluvial deposits, which are

characterized by various loose clay, silt, sand, and gravel that have been deposited by a water source (United States Geological Survey, 2021).

Topography

The topography associated with both properties and the general area of Lahaina is level and gently slopes in a *makai* direction (west/southwest) from both sites to the shoreline. In general, the town is relatively level due to development and its elevation being near sea-level. Lahainaluna, northeast and *mauka* of Lahaina, reaches higher elevations, with Lahainaluna High School being located at approximately 500 feet above mean sea level (AMSL) (See Figure 3-1).

Honoapiilani Highway runs through Lahaina Town anywhere between 500 and 2,000 feet inland from the shoreline at an elevation of approximately 30 feet AMSL before running adjacent to the shoreline at the northern end of Lahaina. David Malo Circle is located *mauka* (mountainside) of Honoapiilani Highway and Piilani Homes is located *makai* (oceanside) of Honoapiilani Highway (See Figure 3-1).

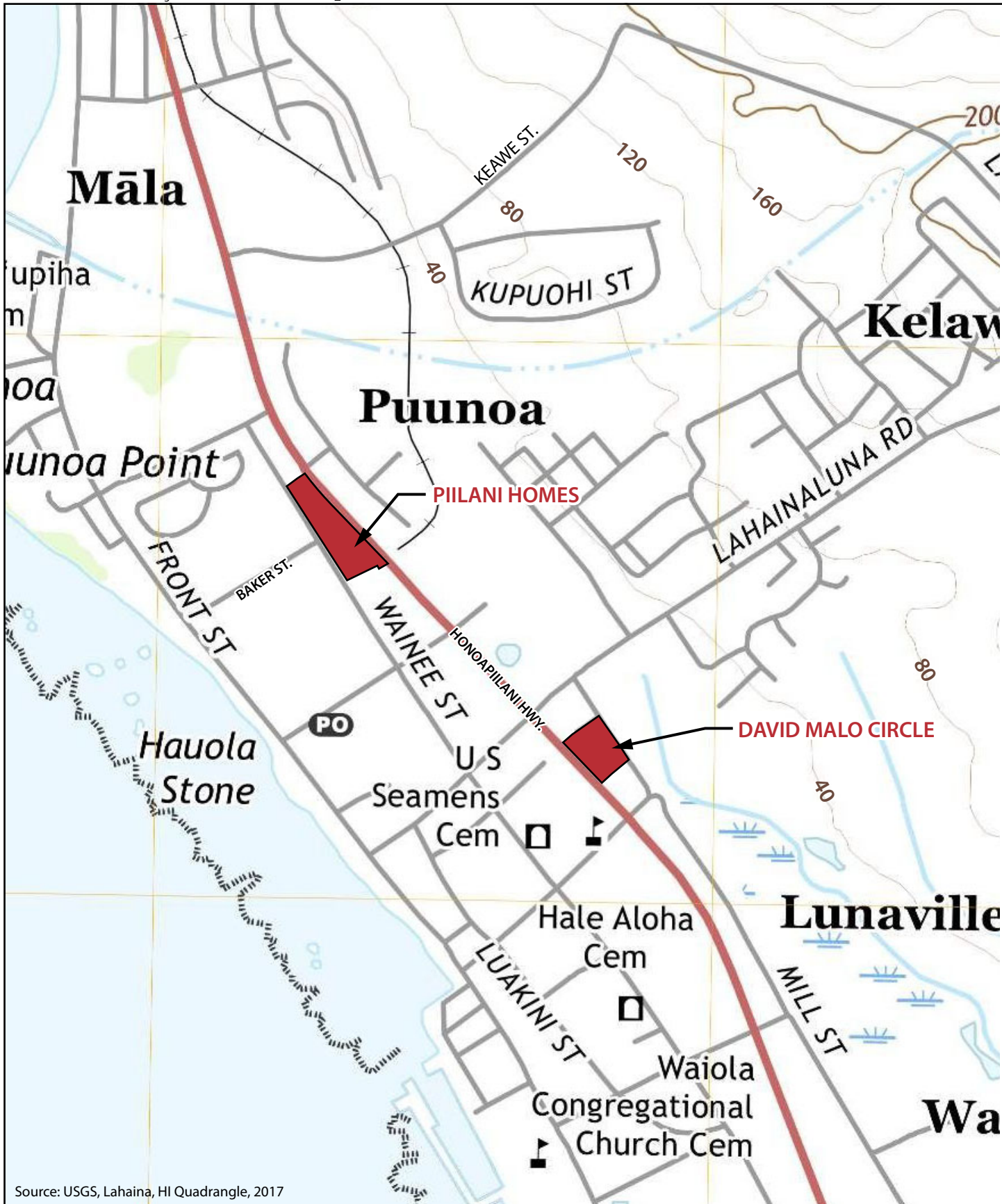
The elevation of the Piilani Homes site ranges from 26 feet AMSL at its northern end to 33 feet AMSL at its southeastern end. The elevation at the David Malo Circle property ranges from approximately 39 feet AMSL at its eastern boundary to approximately 36 feet AMSL at its western boundary. Topography on both sites is less than a 1% grade generally sloping from the east (*mauka*) to the west (*makai*).

Soils

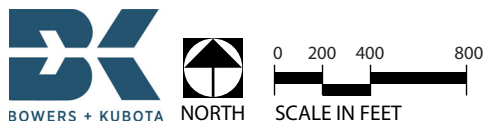
The United States Department of Agriculture (USDA) Natural Resources Conservation Service's (NRCS) Soil Survey provides soil data for more than 95 percent of the entire United States. Soils in the Project's area consist mainly of the following series:

- **Ewa silty clay loam (EaA):** This soil series is well drained and has a typical slope of less than three percent. It has a very low runoff class and a moderately high to high capacity of water transmission in its most limiting layer. For this soil series, the water table, or the depth at which the ground is saturated with water, is typically more than 80 inches deep.
- **Pulehu silt loam (PpA):** This soil series is well drained with a typical slope of less than three percent. The soil series has a low runoff class with a high to moderately high capacity of water transmission. The water table is located more than 80 inches deep for this soil series.
- **Wahikuli very stony silty clay (WdB):** This soil series is considered well drained with an expected slope between three and seven percent. The soil series has a medium runoff class and a restrictive layer of lithic bedrock approximately 31 to 34 inches deep. Its most limiting layer has a low to moderately low capacity of water transmission and the water table is more than 80 inches below the surface.
- **Wainee very stony silty clay (WxB / WxC):** This soil series is typically well drained with a moderately high to high water transmission capacity. The WxB series typically has a slope between three and seven percent, while the WxC series has a slope between seven and fifteen percent. For this soil series, the water table is more than 80 inches below the surface (Natural Resources Conservation Service, n.d.).

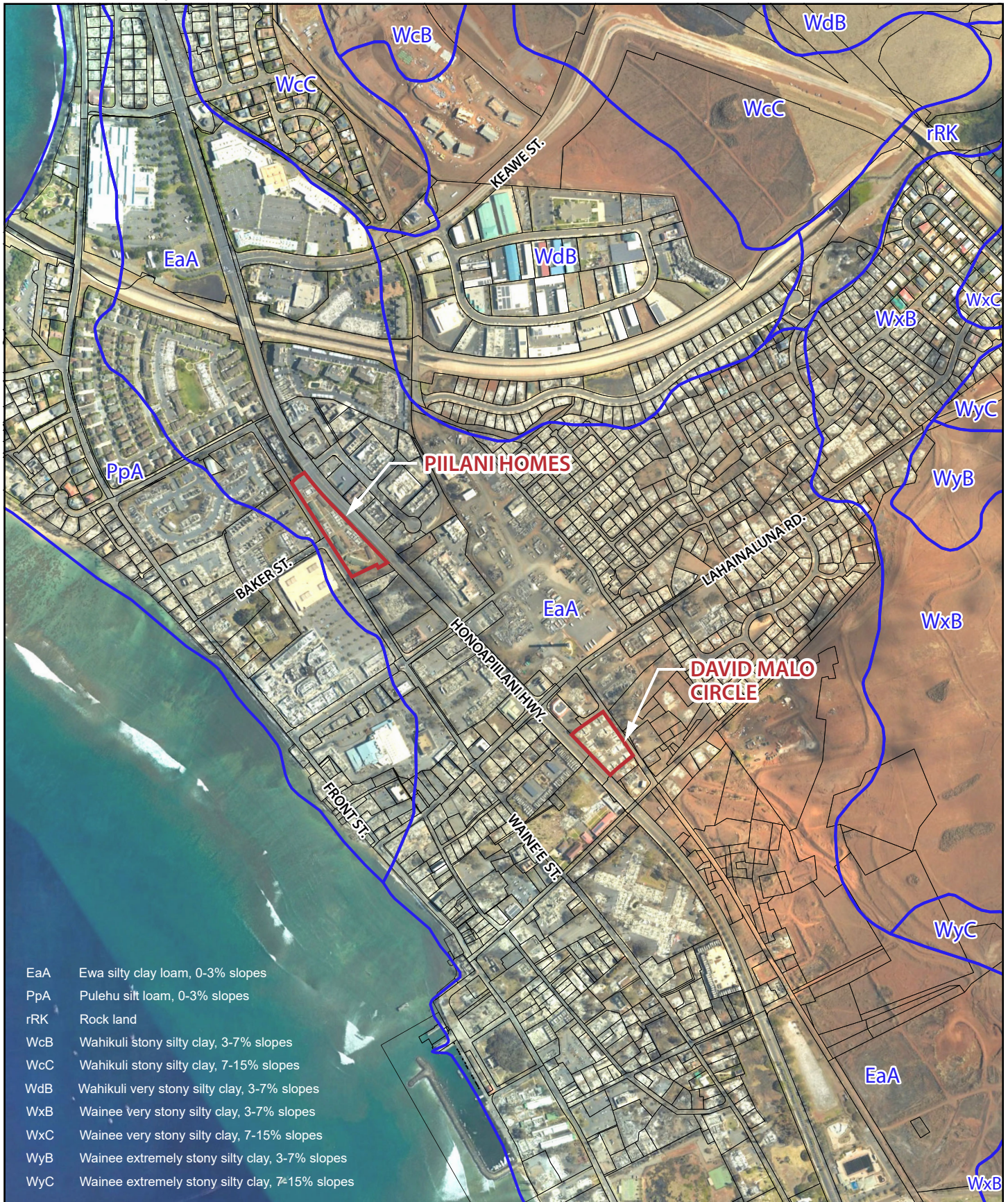
The Pulehu soil series is mainly located along the coastal areas of the region. The Ewa series is generally located *mauka*, or upland, from the Pulehu series. The Wahikuli series is located further *mauka* of the Ewa soil series and at the northern end of Lahaina Town. The Wainee soil series is also located *mauka* of the Ewa series and east of Lahaina Town. As shown in Figure 3-2, the soil within both the David Malo Circle and Piilani Homes sites are identified as Ewa silty clay loam.



Source: USGS, Lahaina, HI Quadrangle, 2017



**FIGURE 3-1
TOPOGRAPHY MAP**



- EaA Ewa silty clay loam, 0-3% slopes
- PpA Pulehu silt loam, 0-3% slopes
- rRK Rock land
- WcB Wahikuli stony silty clay, 3-7% slopes
- WcC Wahikuli stony silty clay, 7-15% slopes
- WdB Wahikuli very stony silty clay, 3-7% slopes
- WxB Waivee very stony silty clay, 3-7% slopes
- WxC Waivee very stony silty clay, 7-15% slopes
- WyB Waivee extremely stony silty clay, 3-7% slopes
- WyC Waivee extremely stony silty clay, 7-15% slopes

0 200 400 800
SCALE IN FEET

**FIGURE 3-2
NRCS SOILS MAP**

The Agricultural Lands of Importance to the State of Hawaii (ALISH) for the islands of Kauai, Oahu, Maui, Molokai, Lanai, and Hawaii produced in 1977 by the State Department of Agriculture (DOA) developed a classification system to identify agriculturally important land in the State of Hawaii based mainly on soil characteristics as well as some other attributes. ALISH classifications are Prime, Unique, and Other, with lands classified as Prime being the best suited for agriculture (State Department of Agriculture, 1977). The Project sites are located on lands not classified as important by ALISH with some lands classified Prime ALISH north of the Piilani Homes property and east and south of the David Malo Circle property. Figure 3-3 depicts lands designated by ALISH with respect to the Project sites.

The Land Study Bureau (LSB) produced agricultural productivity ratings for each of the main Hawaiian Islands based on overall soil productivity ranging from A to E, with A being the highest productivity rating and E being the lowest. The analysis included attributes including soil texture, soil type, drainage, stoniness, topography, climate, and rain. The LSB rating for Maui was published in 1967. Soil within both Project sites are not rated by LSB, however lands rated A are directly east and *mauka* of the David Malo Homes property (Land Study Bureau, 1967). Figure 3-4 shows the location of the Project areas in relation of lands rated by LSB.

3.1.2 Potential Impacts

Geology

Proposed Action. The Proposed Action would have no impacts on the geology of both Project sites. There would be no major cut or fill activities anticipated that would significantly alter or impact the geology of either the David Malo Circle site or the Piilani Homes site.

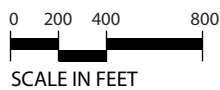
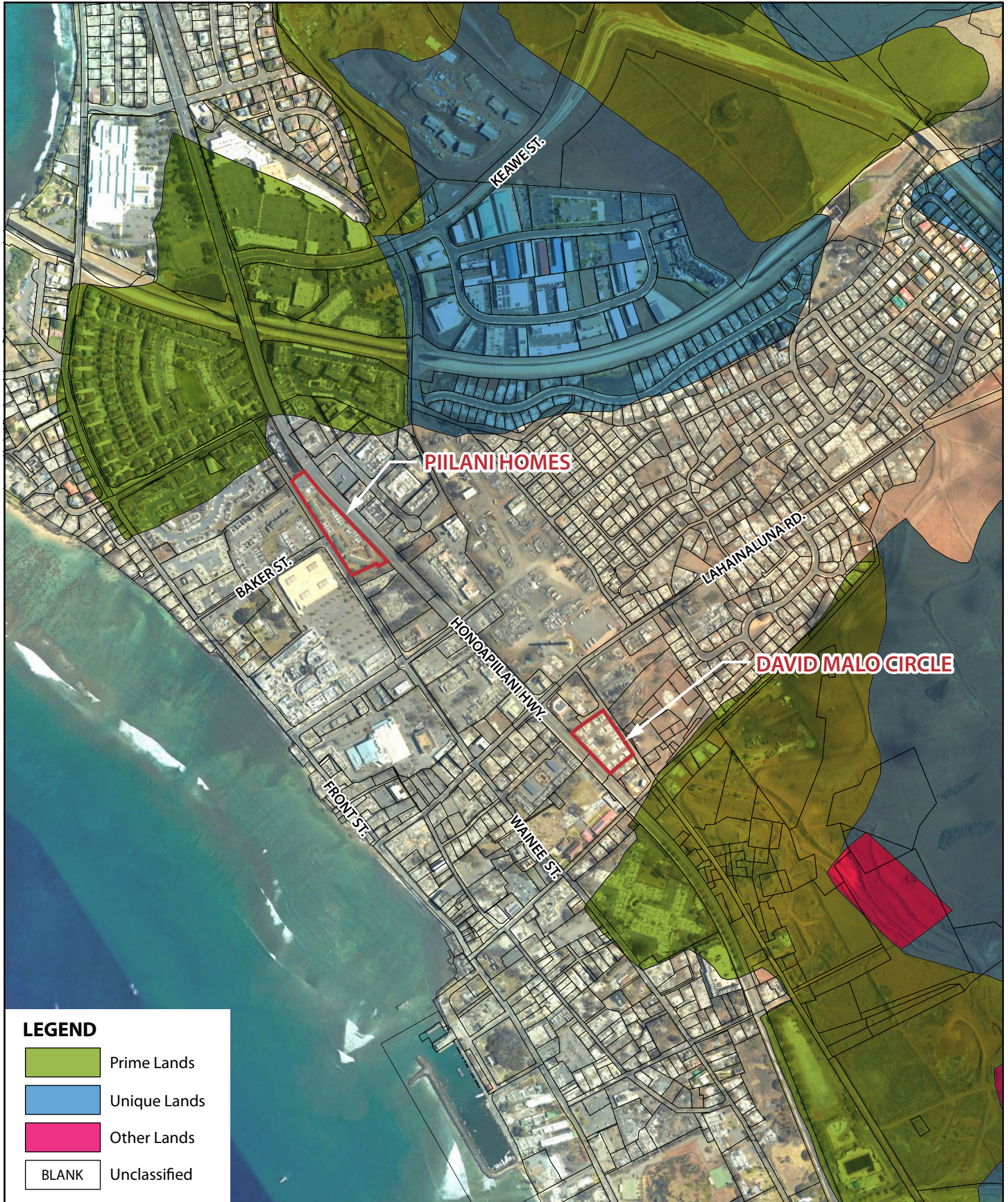
The Proposed Action would involve short-term effects involved with demolition, site stabilization, and soil sampling and testing. The Proposed Action does not involve any construction or major grading. The groundwork associated with site stabilization and soil sampling would be minimal as both properties are generally level and have been previously developed for residential activities. Thus, the Proposed Action is not anticipated to have a significant long-term or short-term impact on the existing geology of either property.

No Action Alternative. The No Action Alternative would have little to no impact on the current geology of the properties as the existing site conditions would continue at both sites. The existing David Malo Circle and Piilani Homes structures would remain on both properties and no demolition or soil samples would occur.

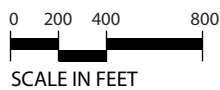
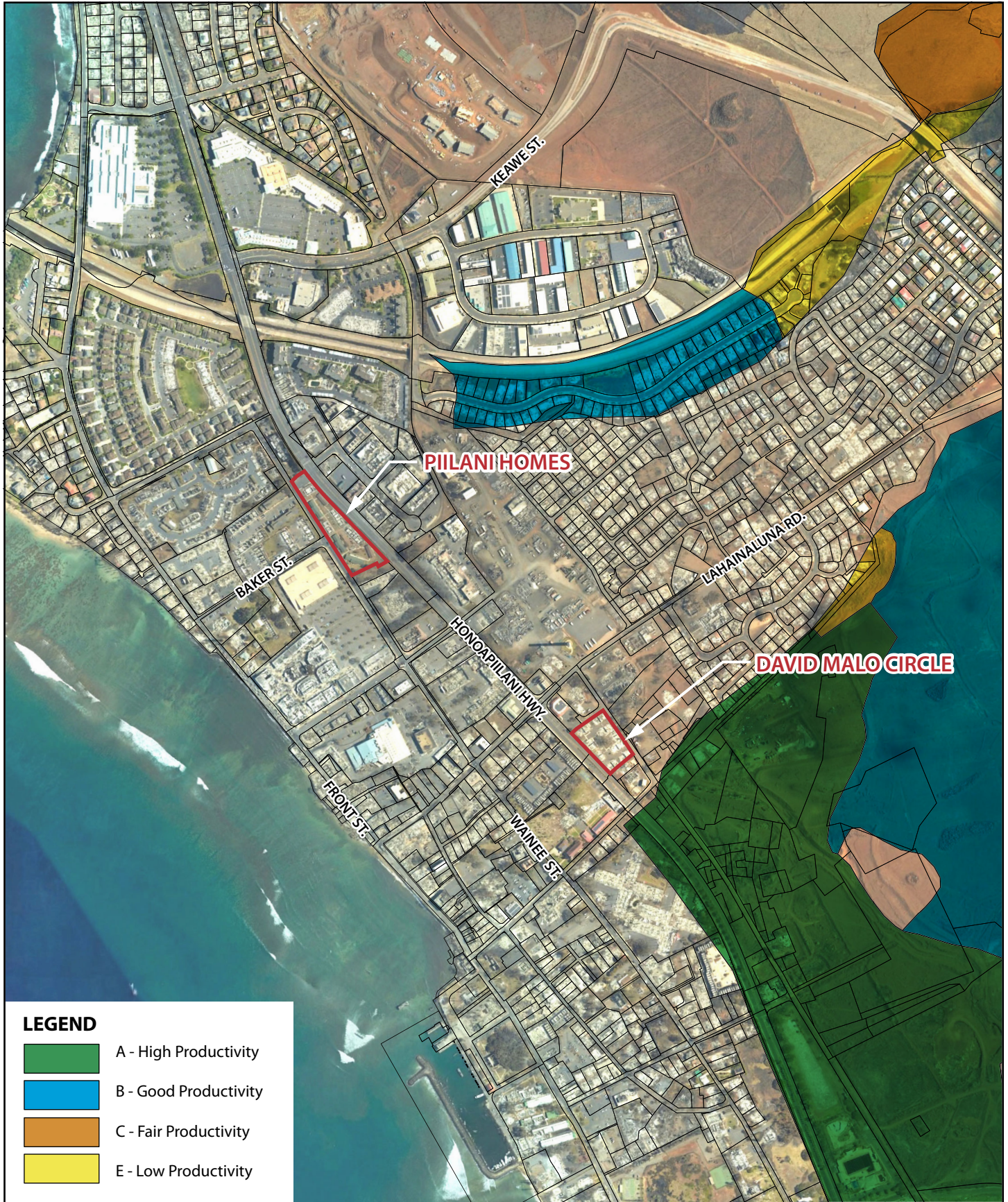
Topography

Proposed Action. The Proposed Action would have minimal to no impact on the topography of the Project sites. These sites were previously graded to develop the residential structures and associated buildings and roadways that comprised the David Malo Circle and Piilani Homes properties.

The Proposed Action would involve some short-term effects related to the demolition of existing damaged buildings and structures. Minor grading activities may be required to level out and stabilize the sites according to drainage requirements. However, this work is not anticipated to involve major cut or fill activities due to the previous grading and development of the sites. Therefore, the Proposed Action should have minimal short-term impacts on the existing topography and no negative long-term effects once completed. The Proposed Action would be completed in compliance with applicable federal, state, and county regulations or agency requirements and after obtaining any required ministerial permits (e.g., grading permit) to avoid significant impacts from occurring.



**FIGURE 3-3
ALISH MAP**



**FIGURE 3-4
LSB SOILS MAP**

No Action Alternative. The No Action Alternative would have no impact on the topography of the Project sites because the current site conditions would continue.

Soils

Action Alternative. The Proposed Action should have minimal impacts on the soil conditions of the Project sites. The proposed demolition and site stabilization of these properties would have minimal short- or long-term impact on the existing soil due to the properties' previous grading and residential uses.

The demolition of the remaining buildings and structures at the sites would have minimal short-term construction related effects on existing soils as most of these structures have concrete or other types of foundations present. Grading activities should similarly have minimal impact on underlying soils as no major cut or fill activities would take place that would significantly alter the underlying soils. No significant importing or exporting of soil is expected unless soils within the Project sites are found to contain heavy metals needing to be removed based upon the DOH's EALs. However, the amount of such soils that may need to be removed is anticipated to be minimal based upon the prior debris cleanup work already completed by the USACE which showed no major excavation work required for building sites.

The project sites are not used for any agricultural production or other associated use as they were used for low-income residential housing. The soil within the Project sites is not identified for agricultural production and the ALISH map (Figure 3-3) showed that these housing sites are not located on lands classified as important for agricultural use. Once the demolition and site stabilization are completed, there are no anticipated adverse long-term impacts on soil, such as reduced soil quality, that would negatively impact agricultural production.

Demolition work associated with the Proposed Action may involve some temporary land-disturbing activities that could cause minor short-term effects and nuisances. Such effects may be associated with some soil erosion during periods of heavy rainfall or high winds.

Minimization Measures

Minimization measures using standard construction best management practices (BMPs) will be incorporated into the Proposed Action to minimize potential short-term effects. Such measures would be instituted following site-specific assessments and may incorporate structural and non-structural BMPs, as they are deemed appropriate. BMPs considered may include the following measures:

- Installing a perimeter construction fence.
- Using controlled watering to allay dust during the demolition work.
- Collecting and placing building debris, as it is created, into roll-off bins or trucks for hauling and removal from the site.
- Installing silt fences, snake bags or other means to mitigate silt laden runoff from leaving the site.
- Installing stabilized construction entrances, tire wash areas, and concrete washout areas.
- Use of temporary sprinklers in non-active construction areas and stationing water trucks nearby during construction to provide sprinkling in active areas.
- Thorough watering of disturbed areas after construction activity has ceased for the day.

The measures implemented are dependent on the Project's site conditions and will comply with applicable erosion and sedimentation control regulations. Erosion and sedimentation control plans will be submitted to pertinent agencies for ministerial review and approval. A State Department of Health

(DOH) National Pollutant Discharge Elimination System (NPDES) permit for construction activities would also be obtained.

No Action Alternative. The No Action Alternative would have no impact on the current soil conditions because the current conditions would continue. However, this alternative means that no soil sampling or site stabilization would take place to remove potential hazardous material created from the effects of the Lahaina Wildfires. This condition may result in the potential for some soil conditions to continue retaining heavy metals that should be removed due to their potential spread to surrounding sites from runoff, etc.

3.2 NATURAL AND MAN-MADE HAZARDS

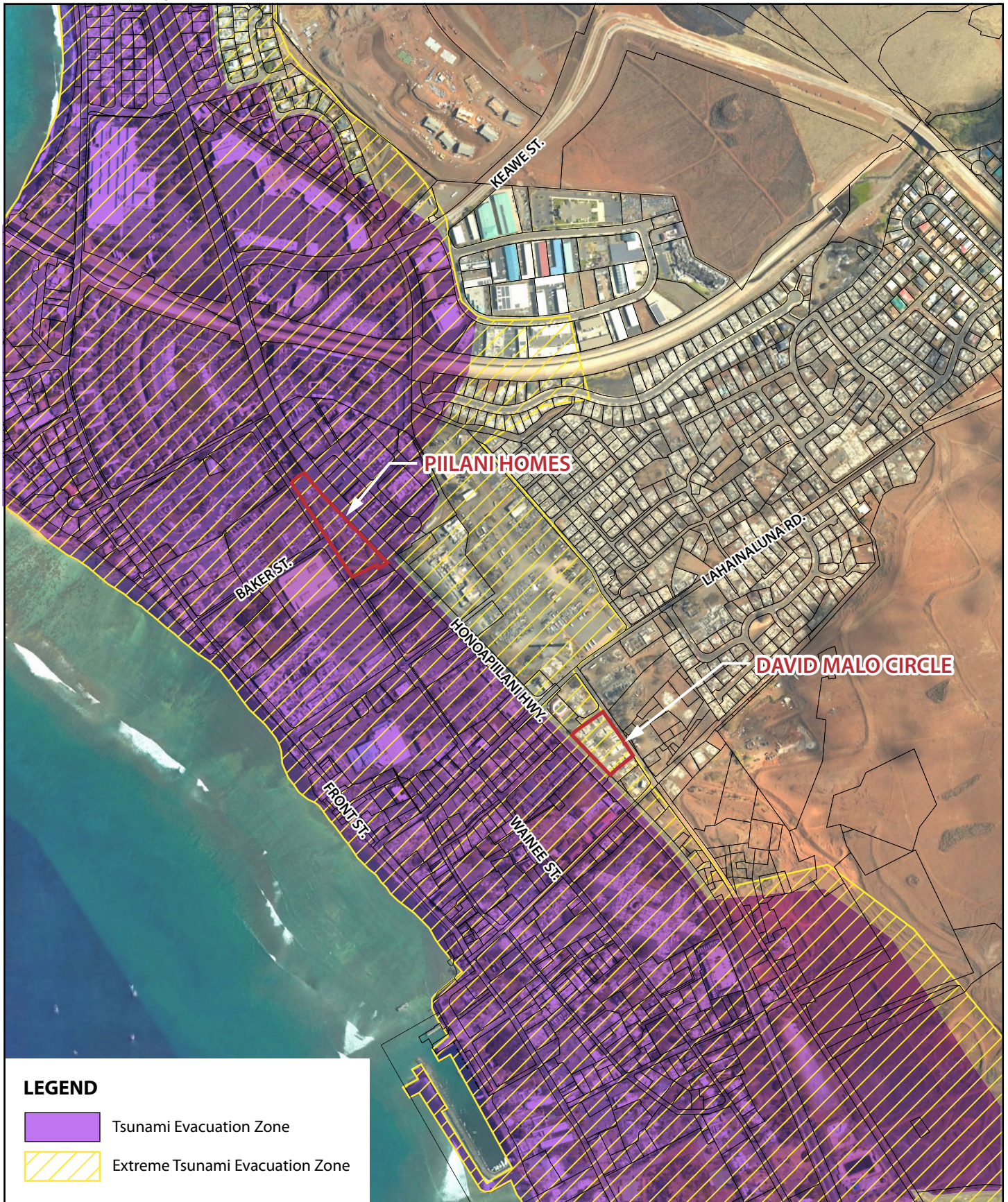
This section addresses hazards that may be applicable to the project. Natural hazards consist of earthquakes, lava flows, hurricanes, tsunami and flooding hazards, and sea level rise. Man-made hazards include those which are induced mainly by human activities. For this purposes of this section, man-made hazards include hazardous materials that may exist on-site from past activities such as construction.

3.2.1 Affected Environment



Earthquake Hazards



Most earthquakes in Hawaii are directly linked to volcanic activities and the islands' volcanic structure. The movement of magma from active volcanoes on the island of Hawaii causes many small earthquakes every year. Larger tectonic quakes are caused by structural weakness at the volcano's base or movement deep within the earth's crust. The most recent earthquake to reach over a 5.0 happened in 2019 less than three miles north of Hilo and Kailua-Kona, Hawaii and 17 miles below sea level according to the United States Geological Survey (USGS). The earthquake was not associated with magma movement or the volcanic process and was attributed to the stress of the weight of the island on the ocean crust. The movement of this earthquake was reported on all the Hawaiian Islands (United States Geological Survey, 2021).

In 2021, the U.S. National Seismic Hazard Model for the State of Hawaii was updated from its previous 2001 version using new earthquake data (Petersen, Shumway, & Powers, 2022). The model depicts the chance of a slight or greater damaging earthquake affecting each portion of the State within a 100-year time frame. The Project sites as well as the entirety of Maui Island are located in the region of highest risk. This region is described as having a greater than 90 percent chance of experiencing a damaging earthquake in 100 years.



LEGEND

-  Tsunami Evacuation Zone
-  Extreme Tsunami Evacuation Zone

  0 200 400 800
SCALE IN FEET

**FIGURE 3-5
TSUNAMI EVACUATION ZONES**

Tsunami Hazards

A tsunami is a series of extremely long ocean waves caused by a large and abrupt displacement of the ocean that are mostly generated by earthquakes in marine or coastal regions, undersea volcanic eruptions, or landslides (National Oceanic and Atmospheric Administration, n.d.). A tsunami can cause widespread destruction of coastal structures and communities. Over the past centuries, about 78% of tsunamis have occurred in the Pacific Ocean. While the development of deep ocean tsunami detectors and models have improved the ability of communities to prepare for tsunamis, predicting when and where a tsunami will strike is not possible.

Therefore, tsunami evacuation and extreme tsunami evacuation zones have been established throughout the State of Hawaii as areas that should serve as a guideline as the minimum safe evacuation distance in the event of a tsunami (Hawaii Emergency Management Agency, 2023). The Piilani Homes property is within both the tsunami evacuation zone and the extreme tsunami evacuation zone. The David Malo Circle property is located outside of the tsunami evacuation zone and within the extreme tsunami evacuation zone. Figure 3-5 shows the David Malo Circle and Piilani Homes properties relative to the established tsunami evacuation zones.

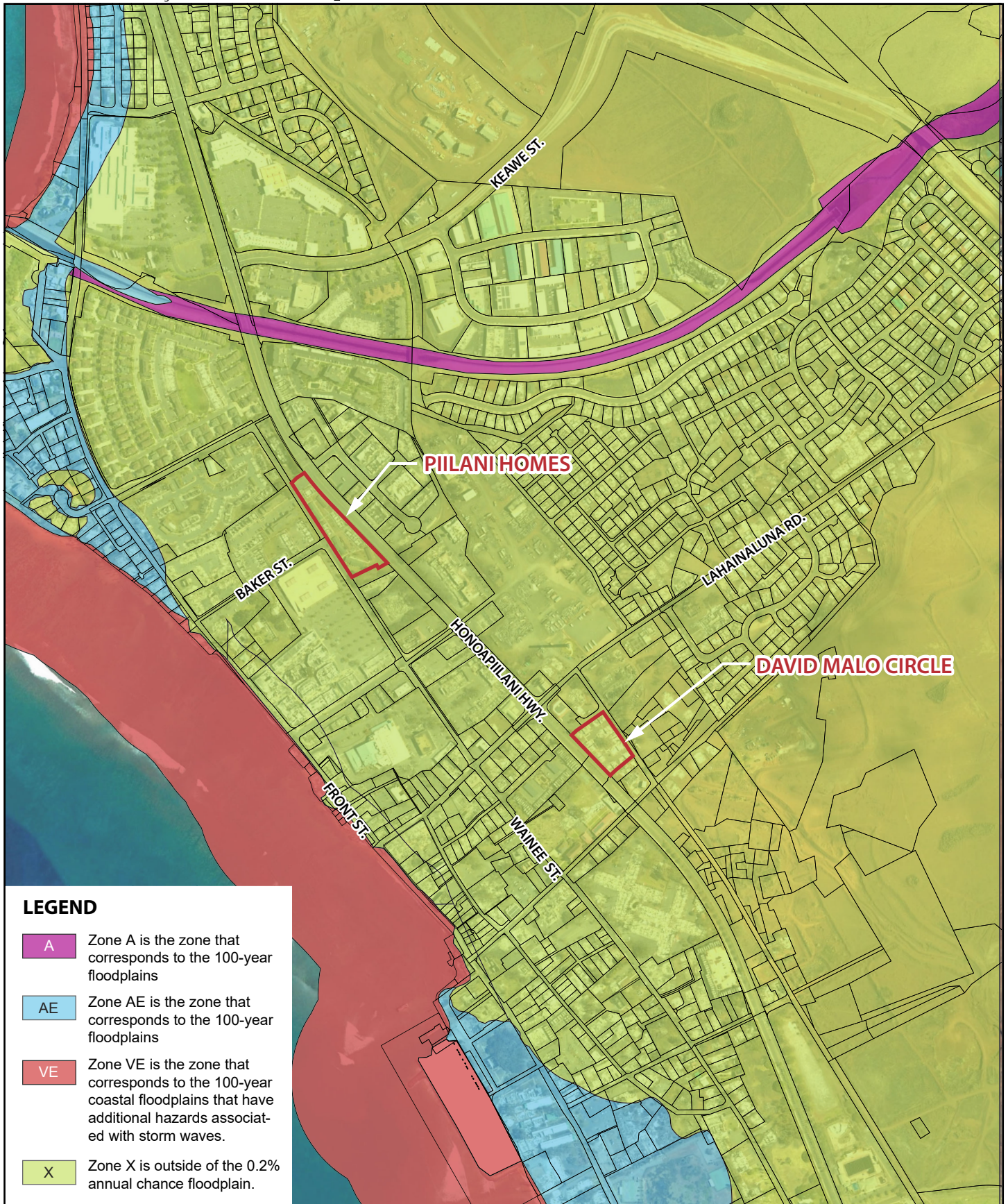
Flood Hazards

Flooding hazards occur naturally and can happen anywhere due to heavy rain, poor drainage, and other environmental conditions. As previously discussed, rainfall in the Lahaina area is relatively low. The Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) maps both properties, assigning them a flood zone and risk of flooding. Flood hazards are additionally mapped by the State Department of Land and Natural Resources' (DLNR) Flood Hazard Assessment Tool (FHAT), which shows that David Malo Circle is mapped within FIRM Panel 1500030362F and Piilani Homes is mapped within FIRM Panel 1500030361F (State Department of Land and Natural Resources, 2024). Both properties are within Zone X, which is determined to be low risk of flooding and outside of the 0.2% annual (500-year) chance floodplain (Federal Emergency Management Agency, 2021). Figure 3-6 depicts the flood zones for both properties, as designated by the FIRM.

Hurricane Hazards

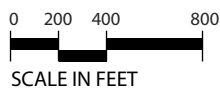
In Hawaii, seasonal storms and hurricanes have the potential to cause severe damage to property, land, and life, primarily occurring from the late summer and early winter months. Characterized by high winds, heavy rainfall, and large storm surges, these tropical storms (winds between 39 to 73 mph) and hurricanes (winds 74 mph or greater) are tropical cyclones that occur over tropical or subtropical oceans and gain their energy from warm ocean waters (National Oceanic and Atmospheric Administration, 2020)

Hurricane season in Hawaii begins in July and lasts through November. Hurricanes in the Central Pacific generally originate in the areas off the coasts of southern Mexico and Central America. The major elements making a hurricane hazardous are: 1) strong winds and gusts; 2) large waves and storm surge; 3) heavy rainfall; 4) coastal and shoreline erosion; 5) and tidal and coastal flooding (Hawaii Emergency Management Agency, 2023). Exhibit 3-2 shows the paths of prior hurricanes and tropical storms that affected the Hawaiian Islands from 1950-2016 based upon information from the National Oceanic Atmospheric Administration (NOAA). Few of these hurricanes make it near the Hawaiian Islands region, as most die off as they move northeasterly over cooler waters and less favorable atmospheric conditions. In the past 50 years, three hurricanes have made landfall in Hawaii,



LEGEND

- Zone A is the zone that corresponds to the 100-year floodplains
- Zone AE is the zone that corresponds to the 100-year floodplains
- Zone VE is the zone that corresponds to the 100-year coastal floodplains that have additional hazards associated with storm waves.
- Zone X is outside of the 0.2% annual chance floodplain.



**FIGURE 3-6
FLOOD INSURANCE RATE MAP**

all on the island of Kauai. Hurricane Iniki in 1992 was the most destructive of these storms, the Category 4 hurricane (recorded wind speeds of 145 mph) directly hit Kauai causing 6 deaths and \$2.2 billion in damages. Other hurricanes and tropical storms have caused damage through flooding, high winds, and high waves (City and County of Honolulu, Department of Emergency Management, n.d.).

While hurricane categories are an indicator of danger, it only considers the wind speeds and does not consider effects of flooding from heavy rains or dangerously high surf. Early warning systems provide residents with time to prepare in the event of a tropical storm, however, impacts are difficult to predict with accuracy due to differences in location and storm intensity. A hurricane or tropical storm of significant strength and wind speed would cause damage to or alter the Project sites. Therefore, preparation in the event of a tropical storm or hurricane is the only way to truly mitigate risk.

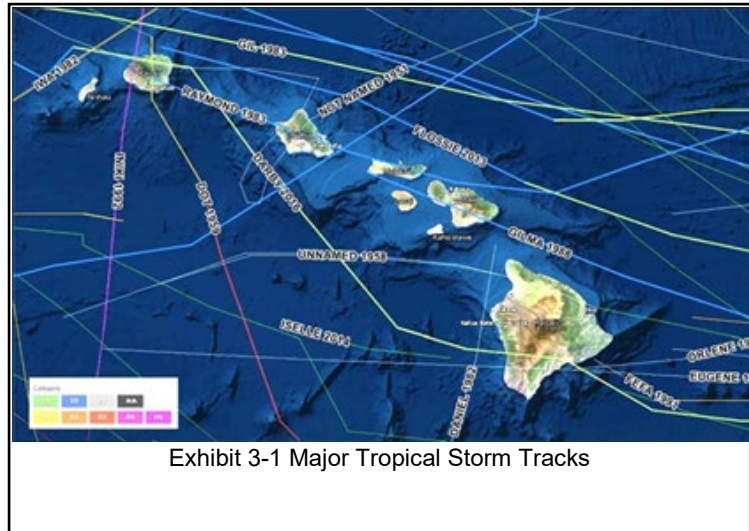


Exhibit 3-1 Major Tropical Storm Tracks

Lava-Flow Hazards

Volcanoes in Hawaii usually erupt at their summits or along their flanks through fractures called rift zones. The hazard is associated with lava flows, explosive activity, airborne lava fragments, poisonous and corrosive volcanic gases, and ground cracks and settling. Lava flows travel downslope toward the ocean and usually do not endanger human life, however, loss of property and economic devastation are the most frequent consequences. At the coastal zone with diminished slope in topography, flowing lava tends to slow and spread laterally causing damage along the shoreline and sometimes creating new land. Volcanic gas consists primarily of water vapor, carbon dioxide, and sulfur dioxide and can result in volcanic smog, known as vog, which has the potential to carry airborne toxins that affect residents and visitors, damages crops and plants, and affects livestock operations (United States Geological Survey, 2023).

The Project sites are located on the west side of Maui, where the volcano system has been deemed inactive and is no longer under watch by the United States Geological Survey's (USGS) Hawaiian Volcano Observatory. While the West Maui Volcano system has been deemed inactive, Haleakala, located some 36 miles southeast of the Project area, had its most recent eruption as recently as 500 years ago and is among six active volcanoes being monitored by the Hawaiian Volcano Observatory. While it may be another 500 years it is possible for Haleakala to erupt sooner (United States Geological Survey, 2023).

Hazardous Materials

Element Environmental, LLC (E2) conducted a Preliminary Assessment of Environmental Hazards for Piilani Homes and David Malo Circle on September 10, 2024, that is included in Appendix C. The assessment was aimed specifically at identifying the hazards presented by materials that remained on-site from the burned buildings and related infrastructure following the August 8 Lahaina Wildfires.

HPHA had both housing sites participate in the cleanup process that was administered by the County of Maui and coordinated with the United States Environmental Protection Agency (USEPA), the United States Army Corps of Engineers (USACE), and FEMA that included two primary phases. The first phase included hazardous material inspection and removal completed by USEPA. The second phase included fire debris removal, disposal, and soil testing that were completed by USACE. The second phase involved the scraping and testing of approximately three to six inches of soil beneath the ash of burned structures on these housing sites to test for 17 heavy metals and repeated the scraping and sampling process until the concentration of metals was below DOH Hazard Evaluation and Emergency Response Environmental Action Levels. Appendix B includes photos of the housing sites where such cleanup has been completed.

All structures at David Malo Circle were burned, leaving only ash and concrete and steel debris. All ash and debris were removed from the site and surface soil was tested and replaced with clean gravel. At Piilani Homes, four structures were burned while five structures were not significantly damaged by fire. The ash and debris were completely removed from the burned former building sites at Piilani Homes site and surface soil was scraped, tested, and replaced with clean gravel.

Formerly Used Defense Sites (FUDS)

The Formerly Used Defense Sites (FUDS) Program is managed by the Department of Defense (DOD) and executed by the USACE to identify and clean up lands within the United States which were used to train military personnel and test military weapons. The FUDS Program has evaluated over 10,000 properties across the country, with approximately 5,400 sites identified for cleanup and 3,800 of those sites having completed cleanup. Sites identified by the FUDS Program are subject to cleanup under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (U.S. Army Corps of Engineers, 2021).

According to the USACE online FUDS viewer, neither Project property is identified as a FUDS. The nearest FUDS location is the Hawea Point Naval Bombing Range, a property approximately 8.5 miles north of Lahaina without a current restoration or cleanup project underway (United States Army Corps of Engineers, 2022).

Climate Change and Greenhouse Gas Emissions

Climate is generally defined as the “average weather” in a location, including patterns of temperature, precipitation, humidity, wind, and seasons. Climate change refers to a long-term shift in established patterns. The Earth’s climate is affected by energy entering and leaving its atmosphere. This can be affected by natural and human factors, variations in the Sun’s energy, or the Earth’s ability to retain or reflect it. The absorption of radiation from the Sun by Earth’s atmosphere keeps the temperature and climate around Earth’s surface relatively stable compared to if there were no atmosphere. This heating effect is called the greenhouse effect (National Oceanic and Atmospheric Administration, 2023).

Climate change is a long-term threat that arises from the human-induced production of carbon dioxide and other “greenhouse gases” (GHG) generated by the burning of fossil fuels. GHG emissions magnify the atmospheric heating from the greenhouse effect. The results are rapid global impacts to the atmosphere, ocean, cryosphere, and biosphere. In Hawaii, climate change effects include rising air temperatures, rising sea levels, and warmer, more acidic coastal waters. Sea level rise can exacerbate coastal hazard impacts and render low-lying coastal areas more vulnerable to tsunami inundation, storm surge, and high-water events. Similarly, as sea levels and the adjacent landside water tables rise, coastal areas will experience drainage issues and an increased risk of flooding, especially during heavy rainfall events. (Intergovernmental Panel on Climate Change, 2023). 2022 was Hawaii’s fifth warmest year on record while 2015 and 2016 were Hawaii’s hottest recorded years in history, with

average air temperatures being 2 degrees Fahrenheit warmer than they were in 1950. Average temperatures could increase by up to 2.7 degrees Fahrenheit by 2024 and 7.2 degrees at sea level by the end of the century. These projected temperature increases are expected to severely affect ecosystems, communities, and the economy in Hawaii (Hawaii Climate Change Mitigation & Adaptation Commission, n.d.).

Sea Level Rise

As the Earth's climate continues to shift around the world, it is recognized that island communities are particularly vulnerable to natural hazards. Current projections of sea level rise anticipate a 3.2-ft sea level rise exposure area (SLR-XA) by 2100. This is associated with a series of consequential impacts such as coastal erosion, intermittent flooding, storm surges, king tides, and contamination of groundwater (Hawaii State Climate Commission, 2022).

According to the State of Hawaii Sea Level Rise Viewer by the Pacific Islands Ocean Observing System (PacIOOS), neither the Project sites nor their access roads are located within the 3.2-ft SLR-XA (See Figure 3-7). However, shoreline roads such as Front Street and Baker Street are anticipated to be impacted in a 3.2-foot sea level rise scenario.

3.2.2 Potential Impacts

Earthquake Hazards

Proposed Action. The risk of potential damage to the Project sites from natural hazards would not be significantly different from the risk of damage under the No Action Alternative or to other sites in Lahaina, and this risk is further reduced as the Proposed Action does not include any construction and would instead demolish existing structures and stabilize the sites.

Both David Malo Circle and Piilani Homes properties share the same risk of earthquake hazard as the rest of the Island of Maui. The Proposed Action will not include construction and will stabilize both Project sites, therefore it is not anticipated to be significantly affected or have an adverse effect on the area's risk of earthquake hazard.

No Action Alternative. The No Action Alternative would not increase or decrease the potential for damage from earthquake hazards as there would be no change to the current buildings and site conditions.

Tsunami Hazards

Proposed Action. The Proposed Action would retain the same property areas as the No Action Alternative, thus, risk from tsunami hazard under the Proposed Action would not be significantly increased. However, the Piilani Homes property is within the tsunami evacuation zone and the David Malo Circle property is within the extreme tsunami evacuation zone, therefore the properties would be subject to evacuation under these tsunami conditions.

No Action Alternative. The No Action Alternative would not increase or decrease the potential for damage from tsunami hazards as there would be no change to the current buildings and site conditions. Under this alternative, both sites would still be subject to evacuation in the event of a tsunami.

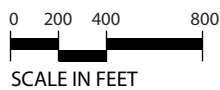
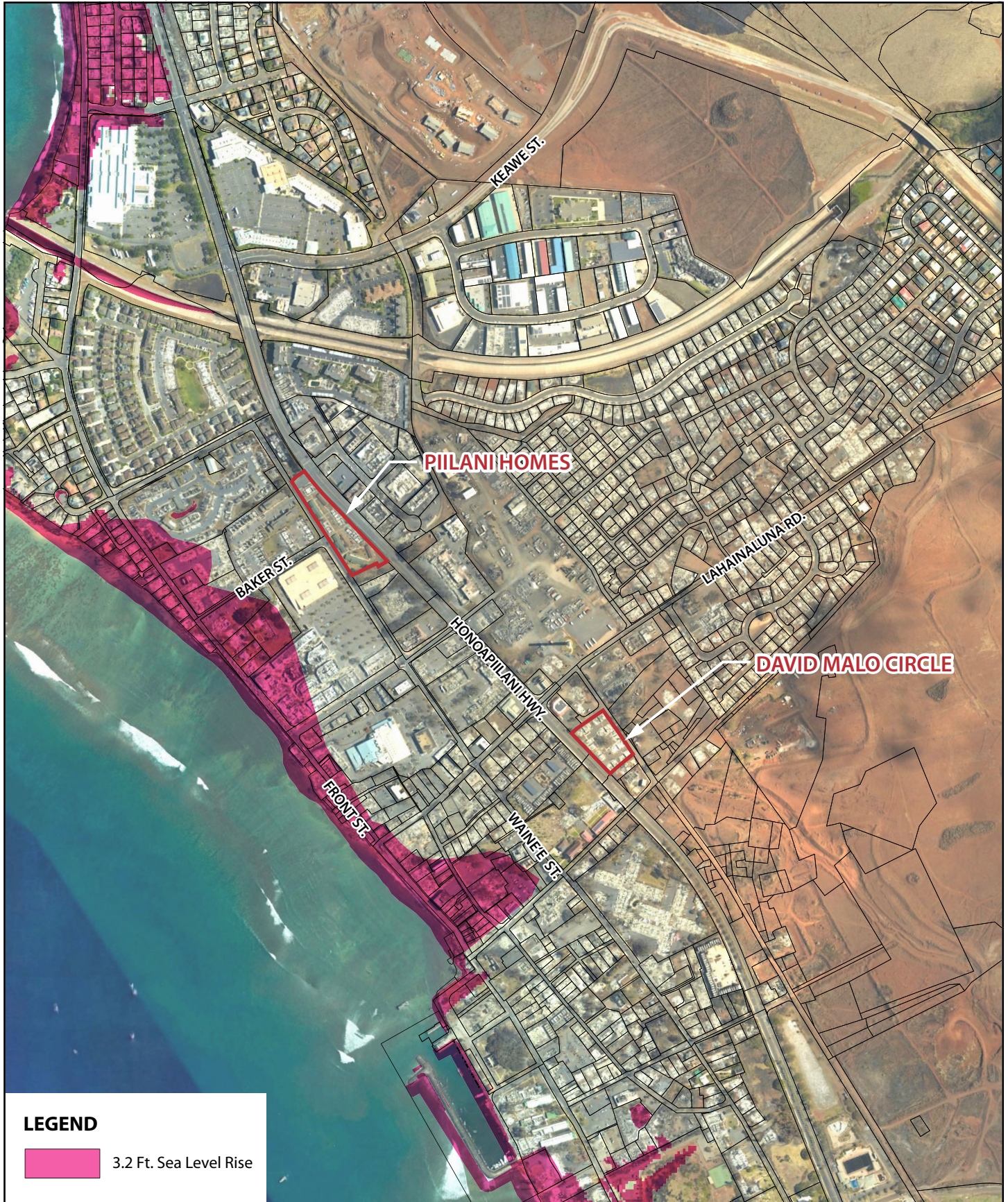


FIGURE 3-7
3.2 FEET SEA LEVEL RISE-EXPOSURE AREA

Flood Hazards

Proposed Action. The Project sites are within Flood Zone X as designated by FIRM, which are defined as the lowest risk areas and do not require flood insurance. Further, the Proposed Action does not add impermeable surfaces or structures that would increase stormwater runoff or the chances of flooding. The Proposed Action will demolish and remove remaining housing structures at Piilani Homes and accessory structures at both sites, thus removing some existing impermeable surfaces. Given the Project areas will remain the same and there will be a reduction of impermeable surfaces, the Proposed Action is not anticipated to be impacted by or have a negative impact on local flood hazards.

Compliance with Executive Order 11988

Executive Order (EO) 11988 requires federal agencies to avoid long- and short-term adverse impacts associated with the use of lands in floodplains. Based on the discussion above regarding the FIRM designation of both Project sites and the anticipated reduction of impermeable surfaces, the Proposed Action complies with EO 11988 as it does not increase the risk of flood loss and takes place outside of the 0.2% annual chance floodplain.

No Action Alternative. The No Action Alternative would not increase or decrease the potential for damage from flood hazards as there would be no change to the current buildings and site conditions.

Hurricane Hazards

Proposed Action. The Project sites would be subject to hurricane and tropical storm hazards which include high winds, heavy rainfall, and inundation and coastal flooding depending on severity. However, the Proposed Action does not include the addition of structures and is therefore not expected to increase the risk of damage to either site from hurricane or tropical storm hazards. Further, the Proposed Action would safely demolish and remove remnant structures, which may decrease the risk of damage from high winds.

No Action Alternative. The No Action Alternative would not increase or decrease the potential for the site to be affected by hurricane hazards as there would be no change to the current site conditions.

Lava Flow Hazards

Proposed Action. While lava flow hazards pose a potential threat to the Project area, the Project sites are located in an area of Maui with an inactive volcanic system and the island's active volcanic system is located a large distance away. Therefore, the Proposed Action is not anticipated to have an adverse impact on or be adversely affected by lava hazards.

No Action Alternative. The No Action Alternative shares the same location as the action alternative and would retain the existing site conditions. Thus, the No Action Alternative would not increase risk or be subject to increased risk of lava flow hazards.

Hazardous Materials

Proposed Action. The Preliminary Assessment of Environmental Hazards prepared by E2 identified cleanup processes that had already taken place on both properties, as well as further recommendations to minimize impacts from hazardous materials ensuing from the Lahaina Wildfires. There were no remaining tasks at either site to be completed by the USEPA or USACE. The preliminary assessment recommended that additional sampling of surface soil be conducted where it had not been previously tested during federal cleanup efforts as fire-related contaminants such as heavy metals could remain there.

Additionally, the remaining buildings at the Piilani Homes site will be inspected for damage to hazardous materials such as asbestos, lead-based paint, etc. which will be addressed according to State and Federal regulations. With these minimization measures, the Proposed Action is not anticipated to be adversely impacted by hazardous materials. Additionally, the Proposed Action would test for and clear any remaining hazardous materials that may be present in the soil or remaining structures at both sites and would therefore have a positive impact on the state of hazardous materials in the Project area.

Compliance with 24 CFR Part 50.3 & 58.5

There are no known hazardous materials or contamination from toxic chemicals, gases, or radioactive substances that could affect the health or safety of occupants or conflict with the intended use of either property. E2 assessed potential hazardous materials and contamination at both the Piilani Homes and David Malo Circle properties and found that both sites had participated in the cleanup process administered by the County of Maui in coordination with federal agencies. While the cleanup had successfully addressed hazardous materials within the footprints of destroyed structures, it was recommended that additional soil testing be conducted in areas where soil testing and scraping did not occur, as some soil could contain fire-related contaminants. In addition, E2 recommended inspecting the remaining buildings at Piilani Homes for damage to potentially hazardous building materials such as asbestos, lead-based paint, and damaged Polychlorinated biphenyls (PCB)-containing light fixtures.

The Proposed Action would bring these sites into compliance with 24 CFR Part 50.3 & 58.5 as the Project would test the site for and remove hazardous materials or contamination from toxic chemicals, gases, or radioactive substances.

No Action Alternative. The No Action Alternative would retain current site conditions. Without further soil testing, the Project sites and surrounding areas may be subject to remnant hazardous materials present in areas of untested soils.

Formerly Used Defense Sites (FUDS)

Proposed Action. Neither Project site is identified as a FUDS. Additionally, there are no FUDS within the general vicinity of Lahaina. The nearest FUDS property is located approximately 8.5 miles away from either Project site. Therefore, the Proposed Action should not adversely affect or be affected by and FUDS.

No Action Alternative. The No Action Alternative would not adversely affect or be affected by FUDS, as there are not identified FUDS within the general vicinity of either Project property and the current site conditions at both sites would remain.

Climate Change and Greenhouse Gas Emissions

Proposed Action. Although individual projects are unlikely to have significant impacts on climate change alone, they may have cumulative impacts when their individual GHG emissions are combined collectively over time. The Proposed Action would generate some GHG emissions in the transportation of materials and debris as well as the operation of necessary demolition equipment. However, these emissions would be temporary, and relatively small compared to island-wide activities. Therefore, the Proposed Action does not include any uses or actions that would significantly increase GHG emissions in the long-term and would have a negligible effect on climate change.

No Action Alternative. The No Action Alternative would retain current site conditions and not contribute to GHG emissions or climate change associated with vehicles or other equipment operations.

Sea Level Rise

Proposed Action. The housing sites are located well away from the coastline and are not located within the area affected by a 3.2-foot rise in sea level. Roadways near Piilani Homes are anticipated to be impacted by a 3.2-foot sea level rise scenario. However, roadways essential to accessing the Piilani Homes property are not anticipated to be affected. Therefore, demolition and site stabilization work for these housing sites would not be affected by sea level rise.

No Action Alternative. The No Action Alternative would retain current site conditions, with some roads near Piilani Homes being anticipated to be inundated in a 3.2-foot sea level rise scenario. Both housing sites would continue to be located outside of the area affected by a 3.2-foot rise in sea level.

3.3 AIR QUALITY

The USEPA established National and State Ambient Air Quality Standards (AAQS) to protect public health and welfare from airborne pollutants. These pollutants include carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), particulate matter (PM₁₀), particulate matter (PM_{2.5}), sulfur dioxide (SO₂), and ozone (O₃). Hydrogen sulfide (H₂S) was additionally set as a standard for the State of Hawaii (State Department of Health Air Quality Branch, 2015). The DOH Clean Air Branch is responsible for monitoring ambient air quality and enforcing federal and state standards.

3.3.1 Affected Environment

Air quality is measured by the USEPA Air Quality Index (AQI) and ranges from 0 to 500, with lower values indicating better air quality and higher numbers indicating hazardous air quality (AirNow, 2024). Air quality in the State can generally be described as relatively clean and low in pollution with air quality monitors typically reporting “good” air quality across the State, with AQI values typically below 50 (State Department of Health Clean Air Branch, 2024). The nearest air quality monitor to the Project area is located in approximately 12 miles east of Lahaina in Kahului, which had an average 24-hour PM_{2.5} measure of 4.1 in 2024 (State Department of Health, 2024).

Tradewinds are predominant throughout the year, typically carrying emissions and other air pollutants from inland areas toward the ocean. Local air quality closer to the Project sites would be primarily affected by vehicle emissions in the form of carbon monoxide and by vog when “Kona Winds” bring volcanic emissions from Kilauea Volcano to from the southeast.

3.3.2 Potential Impacts

Proposed Action. There are no anticipated long-term impacts on air quality under the action alternative due to the nature of the Proposed Action being strictly demolition and site stabilization with no additional long-term uses. Minor short-term impacts on air quality from demolition-related activities may be expected and would be associated with fugitive dust emissions and exhaust from necessary on-site demolition equipment. Fugitive dust emissions would be generated by earth-disturbing activities, vegetation removal, and demolition activities.

Construction activities would comply with State’s air pollution controls prescribed under State DOH’s rules (HAR §11-59 “Ambient Air Quality Standards” and HAR §11-60.1 “Air Pollution Control”). These

rules prohibit visible emission of fugitive dust from construction activities at the property line. A dust control plan would be prepared if adverse air quality impacts are anticipated for implementation by the contractor. Dust control measures may involve implementation of a watering program or use of windscreens. Other measures include BMPs at the job site (i.e., tire washing programs), and use of temporary rock pavers for heavily traveled areas with exposed soils.

On-site mobile and stationary construction equipment would also emit air pollutants from engine exhaust. Large construction equipment typically used for earthmoving activities is generally diesel-powered. NO² emissions from diesel engines can be comparatively higher than gasoline powered equipment. However, annual AAQS for NO² should not be exceeded from short-term construction equipment operation. CO emissions from diesel engines are generally low and should be comparatively lower than vehicular related CO emissions on nearby roadways. Exhaust emissions from construction vehicles can be further minimized through the proper operation and maintenance of all equipment.

The State DOH Clean Air Branch comments on the project included standard comments for land use reviews which would be incorporated in demolish plans and activities. A summary of the agency's pertinent comments is provided.

- All project activities must comply with HAR §11-60.1 and an air pollution control permit must be obtained from the DOH Clean Air Branch if required.
- The generation of visible airborne fugitive dust must be reasonably controlled. Activities occurring near residences, businesses, public areas, and major thoroughfares exacerbate potential dust concerns. Development of a dust control management plan is recommended.
- Activities must comply with all provisions of HAR §11-60.1-33 on Fugitive Dust and it is strongly recommended that buffer zones be established for projects involving mixed land use.
- Reasonable measures must be provided to control visible airborne fugitive dust from road areas during activities.
- If the project involves potential asbestos and lead containing materials, contact the Indoor and Radiological Health Branch.

Compliance with the Clean Air Act (40 CFR Parts 6, 51, 93)

The Proposed Action would be compliant with the Clean Air Act (40 CFR Parts 6, 51, 93). The State is not located within a designated nonattainment area for all federal ambient air quality standards as verified under the U.S. Environmental Protection Agency's Green Book for currently designated "nonattainment areas" as of November 2024. The State DOH's annual summary of air quality data further determined that the State was in attainment of all national ambient air quality standards (AAQS). The demolition work is not anticipated to generate emissions that would exceed the state or national AAQS, as work would be temporary and involve minor site disturbances.

No Action Alternative. The No Action Alternative would not have short- or long-term impacts on air quality because the present site conditions would persist and there would be no change to either property's current conditions or uses. The No Action Alternative would thus not impact national or state AAQS as the present site conditions would continue as-is.

3.4 NOISE

The Noise Control Act of 1972 is the U.S. federal noise law intended to protect residents from noise that would jeopardize public health and welfare. Under the Noise Control Act, the USEPA created noise control standards in coordination with state and local governments, which is now law under the

Hawaii Environmental Quality Act and is codified under HRS Chapter 342F (State Department of Health, 2017). Administered by the State DOH Indoor and Radiological Health Branch, HRS Chapter 342F regulates noise pollution through community noise controls. The DOH regulates noise exposure in the following rules:

- HRS, Section 342F – Noise Pollution
- Hawaii Administrative Rules (HAR), Section 11-46 – Community Noise Control
- HAR, Section 12-200.1 – Occupational Noise Exposure

HAR, Section 11-46, Community Noise Control, defines maximum permissible sound levels in A-weighted decibels (dBA) for certain zoning districts and provided minimization and mitigation controls for stationary noises, and equipment related to agriculture, construction, and industrial activities in occur in the zones (State of Hawaii, 2015). Noise emissions from the Proposed Action would be regulated by zoning districts, as shown in Exhibit 3-2 below.

Exhibit 3-2 Maximum Permissible Sound Levels in dBA		
Zoning Districts	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7a.m.)
Class A: Lands zoned residential, conservation, preservation, public space, open space, or similar type	55 dBA	45 dBA
Class B: Lands zoned for multi-family dwellings, apartment, business, commercial, hotel, resort, or similar type)	60 dBA	50 dBA
Class C: Lands zoned agriculture, country, industrial, or similar type	70 dBA	70 dBA

3.4.1 Affected Environment

Existing noise sources in the Project area consist mainly of vehicular traffic and limited human activity. Due to the wildfire, existing areas are still vacant with minimal activity occurring except for roadway traffic mainly along Honoapiilani Highway. The Project sites are adjacent to the main highway which grants access to and from Lahaina Town. Vehicular access along internal County roadways are regulated to those with permitted access by various traffic monitoring stations established.

Noise levels at these housing sites along the highway are likely to be around 65 dBA or less due to the lower volume of traffic along the highway and lack of existing business or commercial activities in the area. The David Malo Circle property is zoned by Maui County for R-2 Residential, while Piilani Homes is zoned for A-1 Apartments.

The State DOH allows construction activities to occur with the appropriate community noise permits during specific hours, as shown below in Exhibit 3-3. Any excessive noise outside of these hours requires an approved Community Noise Variance from the State DOH.

Exhibit 3-3 Allowable Construction Activities and Hours	
Equipment Used	Allowed Hours of Operation
Pile Drivers, Jackhammers, Impact Hammers, Demolition Equipment, etc.	9:00 a.m. – 5:30 p.m.; Monday - Friday
Normal Construction Equipment	7:00 a.m. – 6:00 p.m.; Monday – Friday 9:00 a.m. – 6:00 p.m.; Saturday

3.4.2 Potential Impacts

Proposed Action. For the Proposed Action, no long-term impacts on local noise levels are anticipated because the work only involves the demolition and site stabilization of these two housing sites. Minor short-term noise impacts are anticipated due to demolition activities at the Project sites with an estimated maximum noise level of less than 90 dBA.

The demolition and site stabilization involved with the Proposed Action would likely produce noise levels that are audible to nearby properties. Actual sound levels will be dependent on the activities taking place and equipment being used as well as distance from the Project sites. Exhibit 3-4 shows the typical noise levels of various construction equipment from 50 feet away as identified in the U.S. Department of Transportation Federal Highway Administration’s *Construction Noise Handbook* (U.S. Department of Transportation Federal Highway Administration, 2017).

Exhibit 3-4 Construction Equipment Noise Levels	
Equipment	Typical Noise Level 50 Feet from Source
Backhoe	80 dBA
Dozer	85 dBA
Generator	81 dBA
Grader	85 dBA
Loader	85 dBA
Paver	89 dBA
Scraper	89 dBA
Truck	88 dBA
Pile Driver (Impact)	101 dBA

Because surrounding properties to the housing sites are currently vacant due to the wildfire, there should be no negative impact to these properties from demolition activities. Additionally, noise attenuation results in an approximately 6 dBA reduction in noise levels per doubling of distance from point source noise beginning at 50 feet.

In cases where construction noise exceeds or is expected to exceed the State’s “maximum permissible” property line noise levels, a permit from the DOH will be obtained for the Proposed Action to allow the operation of vehicles, construction equipment, power tools, etc., which emit such noise levels. This ministerial permit is typical for construction activities. The DOH noise permit does not limit the noise level generated at the site, but rather the times at which noise exceeding permitted levels can take place. Specific permit restrictions for activities are:

- No permit shall allow any construction activities which emit noise in excess of the maximum permissible sound levels ... before 7:00 AM and after 6:00 PM of the same day, Monday through Friday.
- No permit shall allow any construction activities which emit noise in excess of the maximum permissible sound levels... before 9:00 AM and after 6:00 PM on Saturday.
- No permit shall allow any construction activities which emit noise in excess of the maximum permissible sound levels on Sundays and on holidays.

24 CFR, Part 51, Subpart B sets noise standards as established by HUD for the purpose of minimizing noise pollution by Federal departments and agencies. Both housing sites are situated along Honoapiilani Highway (Route 30), a County four-lane, two-way principal arterial roadway which accommodates motor vehicle traffic entering, leaving, and traveling through the town of Lahaina. The David Malo Circle housing property features a concrete sound barrier along Honoapiilani Highway to reduce noise received at the site. The Proposed Action would not conflict with HUD’s regulations because it only involves demolition work occurring over a short timeframe. Due to the wildfire, vehicle traffic along Honoapiilani Highway has been reduced and there is minimal traffic occurring within areas

due to access restrictions. The Project may increase noise generation on both sites from the movement of construction related vehicles as part of demolition activities. However, this work would not impact residents at these housing sites because they are now vacant. As such, the Proposed Action would be in compliance with HUD’s noise regulations.

No Action Alternative. The No Action Alternative would have no short-term or long-term impacts on the ambient noise levels because the current site conditions would continue. The No Action Alternative would be subject to impacts from ambient noise levels, such as those generated from nearby construction or demolition, the same as the Proposed Action.

3.5 TERRESTRIAL RESOURCES

3.5.1 Affected Environment

Present vegetation on the two housing sites predominantly consists of non-native weeds that have since grown since the wildfire. The wildfire essentially burned and destroyed all prior vegetation present at these housing sites. David Malo Circle had a large tree present within the site that has since been removed by the USACE as part of their wildfire debris removal and cleanup as shown on the site photos in Appendix B. Prior vegetation present on these housing sites consisted of non-native landscaping vegetation and grass as part of their initial development.

The U.S. Fish and Wildlife Service’s (USFWS) online Information for Planning and Consultation (IPaC) resource was used to identify potential listed terrestrial species that may occur on the housing sites. The results of the IPaC consultation were the potential presence of 17 total listed species for both Project sites and no critical habitats within either project site. The listed terrestrial species resulting from the IPaC are provided below in Table 3-1.

Table 3-1 Summary Listing of Terrestrial Species from IPaC		
Common Name	Scientific Name	Status
Mammals		
Hawaiian Hoary Bat, Opeapea	<i>Lasiurus cinereus semotus</i>	Endangered
Birds		
Band-Rumped Storm-Petrel	<i>Hydrobates castro</i>	Endangered
Hawaiian Goose	<i>Branta sandvicensis</i>	Threatened
Hawaiian Coot (Keokeo)	<i>Fulica alai</i>	Endangered
Hawaiian Duck (Koloa)	<i>Anas nyvilliana</i>	Endangered
Hawaiian Stilt	<i>Himantopus mexicanus knudseni</i>	Endangered
Newell’s Shearwater	<i>Puffinus auricularis newelli</i>	Threatened
Hawaiian Petrel	<i>Pterodroma sandwichensis</i>	Endangered
Insects		
Blackburn’s Sphinx Moth	<i>Manduca blackburni</i>	Endangered
Flowering Plants		
Awivi	<i>Schenkia sebaeoides</i>	Endangered
Carter's Panicgrass	<i>Panicum fauriei var. carteri</i>	Endangered
Enaena	<i>Pseudognaphalium sandwicense var. molokaiense</i>	Endangered
Dwarf Naupaka	<i>Scaevola coriacea</i>	Endangered
Ihi	<i>Portulaca villosa</i>	Endangered

Ohai	<i>Sesbania tomentosa</i>	Endangered
Round-leaved Chaff-flower	<i>Achranthes splendens var. rotundata</i>	Endangered

3.5.2 Potential Impacts

Proposed Action. The proposed demolition work of remaining structures at these two housing sites should have no effect or be not likely to adversely affect listed species because they are unlikely to be present within the area of potential effect, the action would not impact their habitat, or the action with avoidance and minimization measures would ensure the species or their habitat are not negatively impacted. The sites are not designated as critical habitats, nor do they currently contain suitable nesting or foraging habitats as both sites and their surroundings were previously developed and damaged by the Lahaina Wildfires. Demolition work would also not negatively impact current vegetation on the site which consist of weeds and other non-native shrubs that have since grown back after being burned (destroyed) by the wildfire.

Section 7 Informal Consultation with USFWS

The Endangered Species Act (ESA) is codified 16 USC § 1531-1599 and serves the purpose of conserving and protecting threatened and endangered species and their habitats. ESA Section 7 requires federal agencies to consult with the United States Fish and Wildlife Service (USFWS) and National Marine Fisheries Services (NMFS), jointly referred to as the “Services,” on any actions the agency carries out, authorizes, or funds to determine whether there are likely impacts that would jeopardize the existence of listed species or their habitats.

HPHA is the authorized Certifying Officer for the State in conducting consultation requirements for HUD and has initiated Section 7 ESA informal consultation with the USFWS. Additionally, the USFWS provided information on their updated Section 7 consultation process and IPaC online tool as part of early consultation comments. A request for concurrence on effect determinations for the Proposed Action on listed species in Table 3-1 was submitted on December 4, 2024, and is included in Appendix E. The proposed effect determinations for each terrestrial species are discussed below.

No Effect on Species

1. Endangered Hawaiian Hoary Bat (*Lasiurus cinereus semotus*).
2. Endangered Hawksbill Sea Turtle (*Eretmochelys imbricata*).
3. Endangered Blackburn’s Sphinx Moth (*Manduca blackburni*).
4. The threatened Newell’s shearwater (*Puffinus auricularis newelli*), endangered Hawaii Distinct Population Segment of Band-Rumped Storm Petrel (*Oceanodroma castro*), and the endangered Hawaiian petrel (*Pterodroma sandwichensis*), collectively referred to as Hawaiian seabirds.
5. Various flowering plants that include the endangered enaena (*Pseudognaphalium sandwicenseum*), endangered Awiwi (*Schenkia sebaeoides*), endangered Carter’s Panicgrass (*Panicum fauriei var. carteri*), endangered Dwarf Naupaka (*Scaevola coriacea*), endangered Ihi (*Portulaca villosa*), endangered Ohai (*Sesbania tomentosa*), and endangered Round-leaved Chaff-flower (*Achyrantes splendens var. rotundata*).

The Hawaiian hoary bat, or opeapea, roosts in both exotic and native woody vegetation across all islands and will leave young unattended in trees and shrubs when they forage. If trees or shrubs 15 feet or taller are cleared during the pupping season (June 1 through September 15), there is a risk that young bats could inadvertently be harmed or killed since they are too young to fly or may not move away from disturbance.

No trees or shrubs 15 feet or taller remain on these two housing sites as all prior vegetation has been destroyed by the wildfire. Current vegetation growing consists of invasive shrubs and grasses. A lone tree at David Malo Circle was destroyed by the fire and has since been removed as part of the USACE's debris removal effort.

The Blackburn's sphinx moth (*Manduca blackburni*) commonly occurs in native plants including lama (*Diospyros sandwicensis*), ohe (*Reynoldsia sandwicensis*), hao (*Raovolfia sandwicensis*), alaa (*Pouteria sandwicensis*), aulu (*Pisonia sandwicensis* and its varieties), aalii (*Dodonaea viscosa*), nairo (*Myoporum sandwicense*), and wiliwili (*Erythrina sandwicensis*). Blackburn's sphinx moth populations are also associated with tobacco trees greater than 3 feet tall and are primarily associated with aiea (*Nothocestrum* spp.) trees on Maui.

There are currently no host plants for the Blackburn's sphinx moth on either property, as no trees currently remain at David Malo Circle and only a few nonnative scrub bushes remain at Piilani Homes following the Lahaina Wildfires. To prevent the potential development of these habitats, the sites will be monitored every 4-6 weeks for new tree tobacco plants before, during, and after any proposed ground disturbing activity and any new tree tobacco less than 3 feet tall will be removed.

The threatened Newell's shearwater (*Puffinus auricularis newelli*), endangered Hawaii Distinct Population Segment of Band-Rumped Storm Petrel (*Oceanodroma castro*), and the endangered Hawaiian petrel (*Pterodroma sandwichensis*) are collectively referred to as Hawaiian seabirds. These species may fly through the project area at night during the breeding, nesting, and fledging seasons (March 1st to December 15th). They are attracted to lights and after circling the lights they may become exhausted or disoriented, causing them to ground. Downed seabirds are subject to injury or death due to collision with automobiles, starvation, and predation. Young birds flying through the project area between September 15th and December 15th, in their first flights from their nests to the ocean, are particularly vulnerable to light attraction.

The HPHA does not plan to conduct demolition activities for these two housing projects at night. Such demolition activities would not require using temporary outdoor lighting or the permanent installation of outside lights. Therefore, these demolition activities occurring during the day would have no negative impact on Hawaiian seabirds.

There were several flowering plants identified by IPaC for the region where the two housing sites are located. However, these sites do not overlap with any identified critical habitat areas for each of these species based upon IPaC. These endangered plants were not known to be previously present at these housing sites. The Lahaina Wildfires destroyed all prior vegetation existing at David Malo Circle and left only a few remnant shrubs at Piilani Homes. There were no known original native vegetation present at these housing sites prior to the wildfire, as vegetation consisted mainly of lawn and other landscaped plants used as part of their initial development.

Not Likely to Adversely Affect These Species

1. The endangered Hawaiian Coot (*Fulica alai*), endangered Hawaiian Common Gallinule (*Gallinula galeata sandwicensis*), endangered Hawaiian Duck (*Anas wyvilliana*), and endangered Hawaiian stilt (*Himantopus mexicanus knudseni*) that are collectively referred to as Hawaiian waterbirds.
2. Threatened Hawaiian Goose, or Nene (*Branta sandwicensis*).

The endangered Hawaiian Coot (*Fulica alai*), endangered Hawaiian Duck (*Anas wyvilliana*), and endangered Hawaiian stilt (*Himantopus mexicanus knudseni*) are collectively referred to as Hawaiian waterbirds. Hawaiian waterbirds are found in a variety of wetland habitats including freshwater

marshes and ponds, coastal inlets, artificial reservoirs, irrigation ditches, and sewage treatment ponds. Hawaiian stilts may also be found wherever temporary or persistent standing water occurs. Threats to these species include predation by non-native mammals and birds, and habitat loss. The creation of standing or open water may result in the attraction of Hawaiian waterbirds to a site. Additionally, the Hawaiian stilt is known to nest in sub-optimal locations if water is present. Loud noise caused by an action could potentially disturb these species, especially if they are nesting close to the Project site.

Nene are found on the islands of Hawaii, Maui, Molokai, and Kauai and are observed in a variety of habitats. They prefer open areas such as pastures, golf courses, wetlands, natural grasslands, shrublands, and lava flows. Threats to the species include predation from introduced mammalian and avian predators, wind facilities, and vehicles.

The demolition of remaining structures at these two housing sites should not adversely impact Hawaiian waterbirds or Nene. There are no existing wetland habitats or natural water sources within the housing sites or in their immediate vicinity that may serve as habitat for nesting or foraging for these species. These housing sites are situated along the highway and within a previously urban area of Lahaina Town. Demolition activities should similarly not create standing or open water that may attract Hawaiian waterbirds. Best management practices would be incorporated into demolition plans to minimize the creation of such open water. In areas where waterbirds or Nene are known to be present, reduced speed limits will be posted and project contractors and personnel will be notified and educated about the presence of endangered species on-site to ensure that avoidance and minimization measures are fully implemented.

No Action Alternative. The No Action Alternative would have no anticipated short-term or long-term impacts on botanical or faunal species because the current site conditions would continue. If there are remaining hazardous materials within either Project site, there is a potential for them to impact the previously mentioned species; however, these impacts would be unlikely as there are no designated critical habitats or suitable nesting or foraging habitats for the listed species within the Project sites.

3.6 VISUAL RESOURCES

3.6.1 Affected Environment

The Maui Island Plan was adopted in 2012 and provides direction and guidelines for future land use decisions through 2030. The plan sets forth policies for protecting heritage resources and identifies scenic views on the island which contribute to residents' quality of life. The Maui Island Plan's Protected Areas Diagram, which identifies greenways, greenbelts, parks, preservation, and other sensitive land areas for protection, does not depict resources for protection near the Project sites (County of Maui Planning Department Long Range Division, 2012).

The West Maui Community Plan is a community-based plan and was adopted in January 2022. It accounts for communities within the Kaanapali moku and Lahaina moku and designates park and open space land. There are no lands designated by the West Maui Community Plan for parks or open space near the Project Area; however, some goals for open and park space within Lahaina were continued from the 1996 version of the plan forward into the most recent 2022 adopted version (County of Maui Planning Department, 2022).

The two HPHA housing sites had no important scenic or coastal visual resources present within the properties as they consisted of public low-income housing developments, and these housing sites did not serve as important public viewing locations.

3.6.2 Potential Impacts

Proposed Action. The Proposed Action is not anticipated to negatively impact visual resources in Lahaina, as there are none identified within or near the Project sites under either the Maui Island Plan or the West Maui Community Plan. Additionally, the Proposed Action does not include development or vertical construction and will therefore not impact any existing view planes or sightlines.

No Action Alternative. The No Action Alternative would have no impact on visual resources as the current site conditions would continue.

3.7 LAND USE COMPATIBILITY

3.7.1 Affected Environment

State Land Use

Hawaii is unique with respect to the control that the State exercises in land use regulation. Pursuant to Title 13, the State Land Use Law, Chapter 205 HRS, established the State Land Use Commission (LUC), which classified all lands in Hawaii into four land use districts: Rural, Agricultural, Conservation, and Urban. Permitted uses within the State Land Use Districts are prescribed under Title 13, Chapter 205, HRS, and the State LUC's Administrative Rules (HAR) prescribed under Title 15, Subtitle 3, Chapter 15, Land Use Commission Rules.

Permitted activities or uses in the State Urban District are governed by ordinances or regulations of the County within which the urban district is located. Because both Project sites are within the State's Urban land use district, the Proposed Action would be subject to the Maui County zoning ordinance. Figure 3-8 shows the Project sites with respect to designated State Land Use Districts.

County Land Use

The Maui County Code (MCC) is a compilation of ordinances adopted by Maui County. Title 19 of the MCC contains the zoning code which defines the purpose and intent of specific zones and specifies permitted uses and activities, extent of site development, and property design restrictions in each zone.

As shown in Figure 3-9, County zoning designates the David Malo Circle property as R-2 Residential with surrounding land uses including residential, community business, historic, and heavy industrial. Piilani Homes is zoned as A-1 Apartment, with surrounding uses including community business, heavy industrial, and light industrial. The previous use of these sites for public housing was consistent with these County Zoning Designations.

3.7.2 Potential Impacts

Proposed Action. The proposed Project would only prepare these sites for their future continued use for public housing through the demolition of existing structures and site stabilization. The Proposed Action does not include rezoning or the changing of existing land uses. Therefore, there would be no impact on land use or compatibility of land use within the Project area.

No Action Alternative. The No Action Alternative would have no impact on present land uses or compatibility, as the current site conditions and uses would not change.

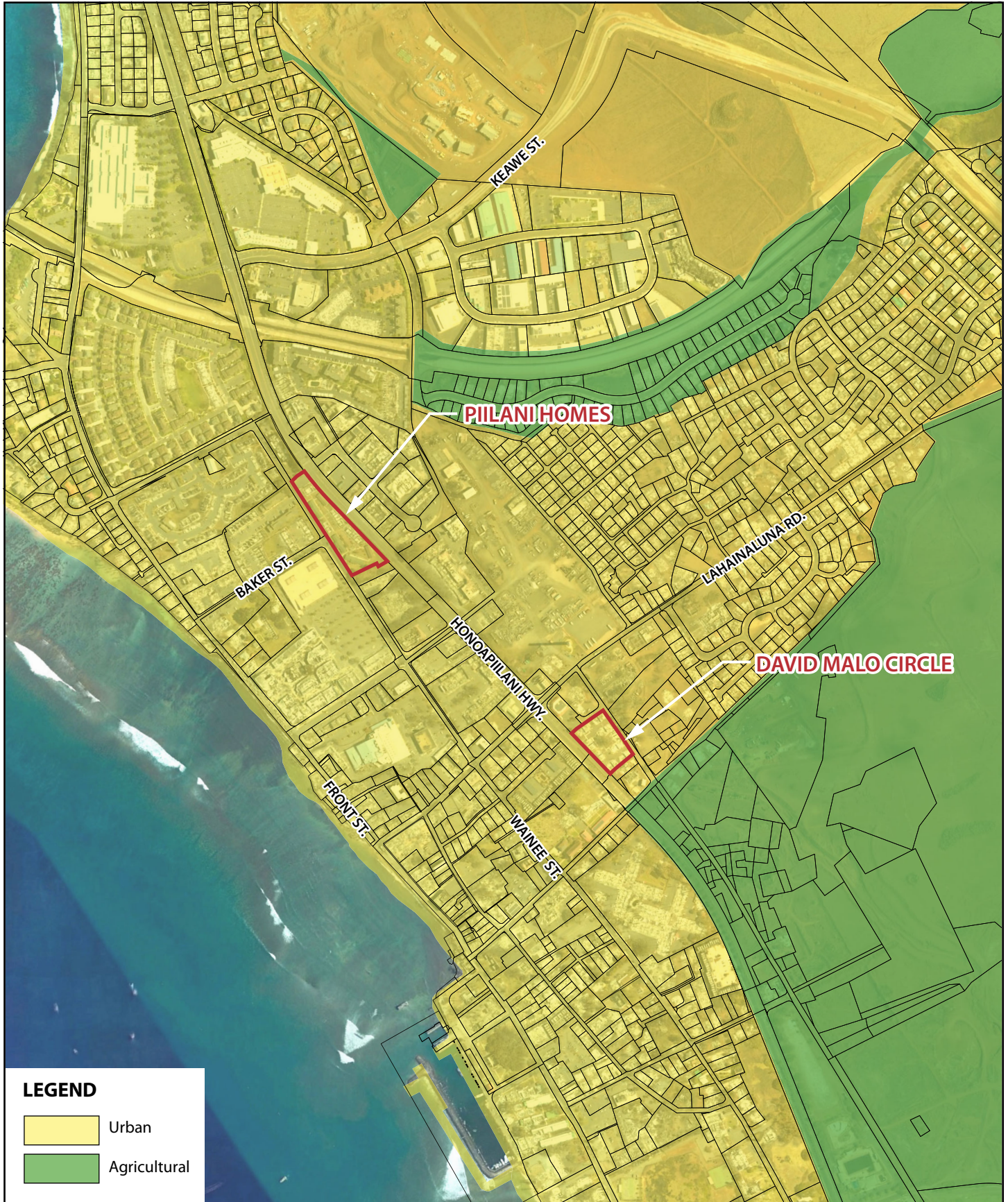
3.8 INFRASTRUCTURE FACILITIES

3.8.1 Affected Environment

Water Supply System

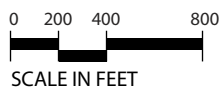
West Maui, including Lahaina, receives its potable water supply from a mixture of surface water and groundwater which come from treatment facilities that are located above Lahainaluna School and near Kapalua Airport. In 2023, the County Department of Water Supply (DWS) completed a drinking water quality report which analyzed levels of contaminants such as lead, copper, fluoride, nitrates, sulfates, and radiological particles. The results of the report showed that the drinking water for the Ualapue Water System was within EPA's allowable limits for all contaminants (County of Maui Department of Water Supply, 2023).

However, water infrastructure and quality were heavily impacted by the Lahaina Wildfires. Water infrastructure repair and water quality sampling efforts are currently being led by the County of Maui and being supported by the State DOH and the EPA. These efforts include the depressurization of the water system and the sampling of drinking water, fire hydrants, and waterlines. Waterlines that are found to be contaminated are isolated and marked for replacement. Water areas found to be unsafe are tracked and information on where to access clean potable water is being provided by the County (United States Environmental Protection Agency, 2024).

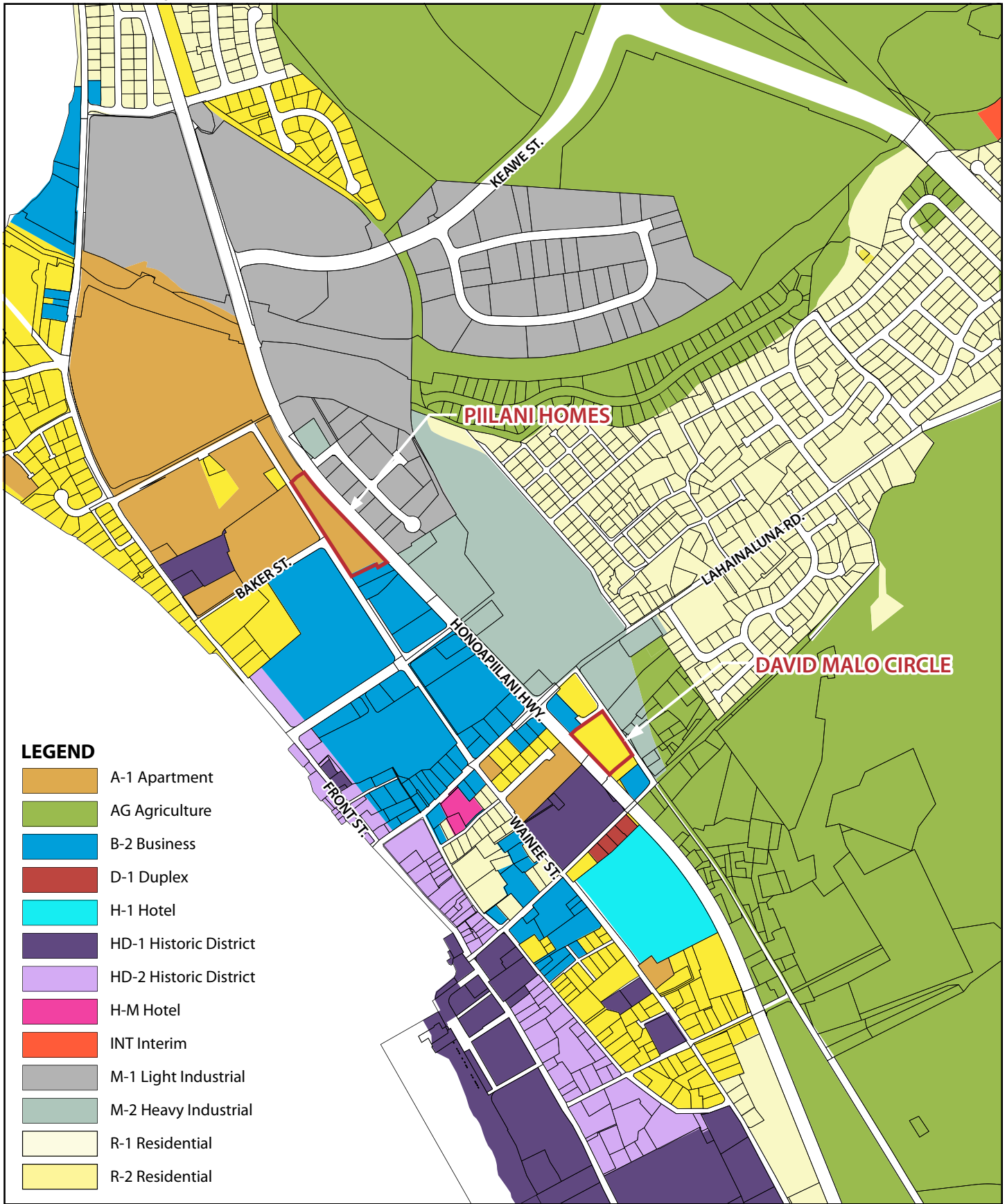


LEGEND

- Urban
- Agricultural

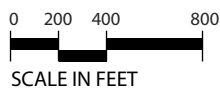


**FIGURE 3-8
STATE LAND USE DISTRICTS**



LEGEND

-  A-1 Apartment
-  AG Agriculture
-  B-2 Business
-  D-1 Duplex
-  H-1 Hotel
-  HD-1 Historic District
-  HD-2 Historic District
-  H-M Hotel
-  INT Interim
-  M-1 Light Industrial
-  M-2 Heavy Industrial
-  R-1 Residential
-  R-2 Residential



**FIGURE 3-9
ZONING MAP**

Wastewater System

Lahaina’s wastewater system is provided through a mix of County and private sewer mains (County of Maui, 2023). The housing projects are serviced by the County’s existing wastewater collection system consisting of sewer gravity mains (8-inch) and manholes. A 21-inch sewer main runs within the adjacent highway right-of-way. However, wastewater infrastructure was also damaged from the Lahaina Wildfires, and its recovery and repair are included in the water infrastructure efforts of the County, State DOH, and EPA. On March 11, 2024, the USEPA completed the cleaning and inspection of almost 100,000 feet of sewer lines in Lahaina. This helped prioritize damaged sewer pipes to prevent saltwater infiltration of the sewer system.

The County Department of Environmental Management (DEM), Wastewater Reclamation Division is working to flush and assess sewer lines in areas impacted by the Lahaina Wildfires, repair wastewater pump stations, and repair and replace underground sewer lines. As of December 11, 2024, portions of the sewer system in Lahaina are functional. As shown in Exhibit 3-6, the sewer service at the David Malo Circle property has been restored, while service at the Piilani Homes remains inactive (County of Maui, 2024). The County DEM Wastewater Reclamation Division also provided early consultation comments regarding the Project and is summarized below.

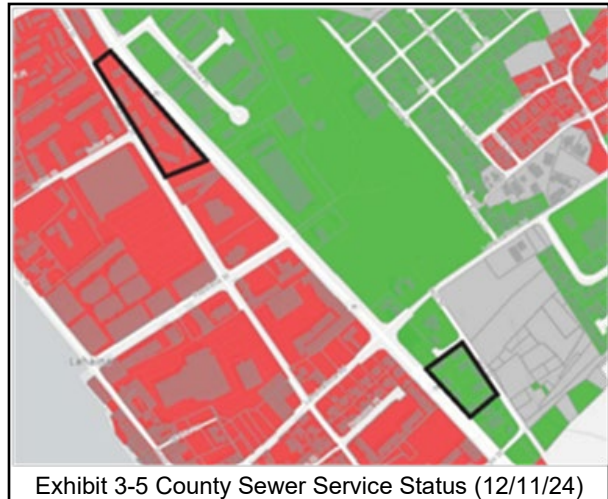


Exhibit 3-5 County Sewer Service Status (12/11/24)

- The County does not have sewer lines within either property. Sewer lines within both properties are privately owned and maintained.
- Existing private sewer lines may have been damaged by the fire and are likely to have contaminated water which should not be flushed into the County system. Sewer lines should be cleaned and assessed by a plumber or contractor to determine if they are structurally sound or should be replaced.
- Redevelopment of the property will require installation of a property sewer service manhole, which can assist with cleaning and assessing the existing system.
- County sewer lines serving Piilani Homes are inactive and expected to be repaired by the end of 2025. Lines serving David Malo Circle are currently active.
- Lahaina Wastewater Reclamation Facility (WWRF) has sufficient capacity to accommodate both properties if rebuilt as originally constructed. There may be capacity to add units, but it will need to be evaluated once the projects are defined.

Storm Drainage System

The County Department of Public Works (DPW) is responsible for overseeing County maintained drainage systems and improvements. The David Malo Circle and Piilani Homes currently have existing site drainage improvements that connect to larger drainage collection systems. For example, the David Malo housing site has drainage inlets observed along the wall bordering the highway. Drainage from these housing sites generally sheet flows in a makai (seaward) direction where they are collected in drainage systems within lower roadways. The condition of the existing drainage system within the HPHA housing sites following the Lahaina Wildfires is unknown, but existing inlets did not appear damaged.

Solid Waste Disposal

The County DEM, Solid Waste Division provides solid waste collection and disposal services which include refuse collection and landfill operations. The Olowalu Recycling and Refuse Convenience Center is approximately 3 miles north of the Project area and includes landfill, recycling, green waste, and motor oil recycling services (County of Maui Solid Waste Division, 2024).

Disposal of solid waste from clean-up efforts following the Lahaina Wildfires has been coordinated in two phases through the County, State, and EPA. Phase 1 consists of the identification and removal of materials hazardous to human health, animals, and the environment from impacted properties in Lahaina, Kula, and Olinda. Phase 2 involves the removal of ash, debris, and contaminated soil to ensure that the sites are safe and clean for rebuilding. Debris are being temporarily stored at a temporary dump site in Olowalu. The Central Maui Landfill which was selected as the permanent disposal site for ash and debris from Phase 2 efforts. However, use of the Central Maui Landfill site for debris from the fires is currently delayed pending a court case which is set for September 2025 (County of Maui, 2024; Honolulu CivilBeat, 2024). As of August 22, 2024, approximately 99% of the residential debris and 53% of commercial and public property debris had been cleared with all debris being stored at the temporary Olowalu site until the permanent debris site can be established (County of Maui, 2024). The Project falls under Phase 2 of the clean-up and debris from the Proposed Action would be transported to the Central Maui Landfill as the designated site. The County DEM also provided early consultation comments summarized below:

- The DEM requests that all re-usable materials be diverted to recycling or other options to lessen burdens on the County landfills and resources.
- If construction and/or demolition materials are expected to be disposed of at a County landfill, a C&D application must be submitted and approved prior to delivery to the local landfill. Customers must have a C&D Number and a valid landfill Disposal Permit and Account. The Solid Waste Division (SWD) should be immediately notified if there are significant revisions or changes to permitted C&D waste hauling.
- Hazardous wastes are not accepted at County landfills but special wastes such as asbestos, contaminated soil, and canec may be permitted upon request.

Electrical and Communications Distribution System

Electrical power on Maui is provided by Maui Electric Company, a subsidiary of the Hawaiian Electric Company (HECO). HECO provides electricity for approximately 95% of all residents in the State of Hawaii and served approximately 72,000 customers in Maui County in 2023. Power was produced through a mix of oil plants and alternative energy, with approximately 35.4% of electricity being generated by renewable energy sources (Hawaiian Electric Company, 2024).

HECO provided Early Consultation comments in an email dated September 19, 2024, which is included in Appendix A. HECO had no objections to the Proposed Action but would require continued access to any existing easements or facilities in the Project properties.

Telecommunication infrastructure on Maui varies, with potential service providers including Hawaiian Telcom, Spectrum, and others.

Gas Facilities

Hawaii Gas provided Early Consultation comments in an email dated September 16, 2024, which included maps of existing gas utility lines in and around the Project sites. At the time of comment, the Hawaii Gas utility system was deenergized and nonfunctional. There are no Hawaii Gas utility lines in or around David Malo Circle, located at 723 Mill Street. There is a nonfunctional existing 4" XTC gas

main line which runs adjacent to Piilani Homes along Wainee Street and through a portion of the parking lot at the north end of the property.

Roadway Facilities

Lahaina is situated along the coast on the west side of Maui Island and is mainly accessed by Route 30, or Honoapiilani Highway, which is a two-way, four-lane roadway with a middle turn lane as it goes through Lahaina. This highway is now open to vehicular traffic through this area as it was previously closed due to the wildfire. However, most internal County roadways are still restricted to official business activities only and there is various monitoring stations established at certain intersections to control access. Given the vast majority of areas in Lahaina have still not been redeveloped, vehicular traffic in the area is very low with the exception of through traffic now occurring along Honoapiilani Highway.

The David Malo Circle property is accessed via Mill Street, a two-way two-lane which runs parallel to Honoapiilani Highway. Mill Street can be accessed via either Dickenson Street or Lahainaluna Road, which both intersect Honoapiilani Highway. The Piilani Homes site is situated adjacent to Honoapiilani Highway and is accessed via Wainee Street. Wainee Street is primarily accessed from Honoapiilani Highway northwest of Piilani Homes via its intersection with Kenui Street, or southeast of Piilani Homes via its intersection with Papalaua Street. Wainee Street runs parallel to Honoapiilani Highway and can be accessed via other neighborhood roadways.

3.8.2 Potential Impacts

Water Supply System

Proposed Action. The Proposed Action is not anticipated to have an impact on the County's existing water distribution system serving this area or their efforts in testing and replacing waterlines and fire hydrants that were damaged by the wildfire. Demolition activities would not require connections to the County's water system or generate potable water demand. Prior water demands generated from these housing projects are no longer being drawn due to the damage caused by the wildfire. Any water needed would be associated with demolition, site stabilization, or BMP measures and would occur for a short period of time. Therefore, there would be no significant negative long-term or short-term impact on the County's water system, supply, and operations.

No Action Alternative. The No Action Alternative would not have an impact on the water supply system because the current site conditions would continue.

Wastewater System

Proposed Action. The Proposed Action is not anticipated to have an impact on the County's existing wastewater system serving this area or their efforts in repairing sewer lines and accessory facilities that were damaged by the wildfire. The County DEM stated they do not have sewer lines within either property as such facilities serving both HPHA housing properties are privately owned and maintained. As part of demolition activities, these private sewer lines may have been damaged by the fire and are likely to have contaminated water that should not be flushed into the County's system. Sewer lines would need to be cleaned and assessed by the demolition contractor to determine if they are structurally sound or should be replaced.

Demolition activities would not require connections to the County's wastewater system or generate wastewater. Wastewater is no longer generated at these housing projects as there are no residents inhabiting them. Portable toilets could be provided by the contractor for workers during demolition activities. Therefore, there would be no significant negative long-term or short-term impact on the County's wastewater system and operations.

No Action Alternative. The No Action Alternative would not have an impact on the wastewater system because the current site conditions would continue.

Storm Drainage System

Proposed Action. The Proposed Action is not anticipated to have a long-term impact on existing storm drainage systems as it will not add impervious surfaces or increase stormwater runoff. The sites were previously developed as housing developments resulting in most of the properties consisting of impervious soil conditions. Runoff from the housing sites was collected by drainage inlets and disposed of as part of the County's larger drainage system serving Lahaina. Demolition activities do not plan on excavating and removing the existing on-site drainage system. Redevelopment of these housing sites will address drainage improvements needed or repaired at that time.

The Project is intended to demolish existing structures and stabilize the site so that it would not increase stormwater runoff occurring. Demolition work would also test and remove remaining soil not previously addressed as part of the COE's effort removing heavy metals. This would have a beneficial effect by removing potentially contaminated soil from being discharged from the site during a storm event that would ultimately be discharged into the ocean. Best management practices would be implemented during demolition activities to minimize effects from stormwater runoff. Additionally, the Project will comply with NPDES and stormwater management requirements.

Clean Water Act of 1972

The Federal Clean Water Act (CWA) of 1972 establishes a regulatory framework to protect the nation's surface water resources. The CWA requires states to conduct a bi-annual surface and marine water quality assessment. Water bodies violating State standards must be reported pursuant to §303(d) of the CWA. The resulting list of impaired water bodies is usually referred to as the "303(d) list," which provides information on the pollutants impairing marine and stream water quality. Additionally, the list identifies priorities for Total Maximum Daily Load development, which is a regulatory term in the CWA that describes the maximum pollutant amount a waterbody can receive while still meeting water quality standards.

Section 401. The Proposed Action would not require a State of Hawaii Water Quality Certification under §401 of the of the CWA as the action does not include construction or additional operations that would result in direct discharges into U.S. waters.

Section 402. The Proposed Action would require coverage under the State's NPDES permit and compliance with conditions.

Section 404. The Proposed Action would not require a U.S. Department of Army permit under §404 of the CWA because there would be no discharge of dredged or fill material into a wetland or navigable U.S. water. Any dredged or fill material that is necessary to be removed would be disposed of at the Central Maui Landfill.

No Action Alternative. The No Action Alternative would have no impact on the storm drainage system as the current site conditions would not change.

Solid Waste Disposal

Proposed Action. The Proposed Action is not anticipated to have a significant or negative long-term impact on solid waste disposal after the demolition work has been completed. Short-term impacts on solid waste disposal services are expected during demolition efforts and site stabilization. Any re-usable materials will be routed to recycling options if possible. A C&D application will be filed with the SWD prior to the disposal of any demolition material and the SWD will be notified immediately should

there be significant changes to the permitted waste. Additionally, any potentially hazardous or special waste which contains materials such as asbestos or contaminated soil will only be disposed of after a request has been filed and arrangements have been made with the landfill.

The project will inevitably have a minor short-term effect from the debris created from the demolition of remaining structures at the housing sites. David Malo only has some accessory structures as all buildings were destroyed by the wildfire and these debris were already removed by the COE. Piilani Homes will have some debris resulting from demolition of the remaining five buildings and accessory structures. However, this additional waste should not have a significant impact on the County's disposal facilities and operations, and efforts will be made to divert recyclable materials and waste before transporting to the County landfill. It is anticipated that these remaining debris should be able to be disposed at the Central Maui Landfill as part of normal construction related debris and not the at the Olowalu site created specifically due to the Lahaina wildfire disaster.

No Action Alternative. The No Action Alternative will have no impact on solid waste disposal services because the current site conditions will persist. There are no inhabitants at either David Malo Circle or Piilani Homes, therefore there is no current trash or refuse generation.

Electrical and Communications Distribution System

Proposed Action. Depending on the site conditions, existing electrical or communication service connections within the housing sites may have to be demolished and removed. Removal of such site utilities should have no impact on existing electrical or telecommunication distribution systems serving the broader Lahaina area as effects are limited to within the two housing sites. HECO will continue to have the ability to access any HECO-owned easements or facilities that exist on either property as demolition activities would not change or affect such easements. Utility companies are restoring the distribution network serving this area and the project would not affect their ability to continue this effort.

No Action Alternative. The No Action Alternative will have no impact on electrical or communication systems as the current site conditions will persist.

Gas Facilities

Proposed Action. The Proposed Action is not anticipated to have long- or short-term impacts on existing gas facilities. As previously discussed, the existing gas lines around and within the Pi'ilani Homes property are underground and deactivated. In addition, the Proposed Action will not involve any earthmoving activities where gas lines have been identified. As such, the work is not anticipated to negatively impact gas facilities in the area.

No Action Alternative. The No Action Alternative will have no impact on existing gas infrastructure as the current site conditions for the Project areas would remain.

Roadway Facilities

Proposed Action. The Proposed Action is not anticipated to have a long-term impact on roadway facilities as it does not include additional housing or other uses that would generate additional traffic on surrounding roadways and highways. Prior vehicular traffic generated from these housing projects and other nearby uses are reduced due to the damage caused by the wildfire and limited access to Lahaina.

Demolition work by the contractor would inevitably have a minor short-term effort on roadway facilities from construction equipment and workers traveling to and from the housing sites. This short-term impact from construction equipment would only take place during construction hours and would avoid any nighttime or weekend impacts. The number of construction workers at each site would also be

relatively low (less than 10 workers) due to the nature of the work (demolition). The additional vehicles that are necessary to complete the demolition work should have minimal impact on the surrounding roadways, especially with vehicle access into Lahaina currently limited to those related to recovery and rebuild.

No Action Alternative. The No Action Alternative will have no impact on roadway facilities because the current site conditions will persist. There are no inhabitants at either David Malo Circle or Piilani Homes, therefore there is no current traffic being generated from both sites.

3.9 PUBLIC FACILITIES

3.9.1 Affected Environment

Recreational Facilities

Multiple parks and recreation facilities are in the general vicinity of the Project Area; however, these facilities may be presently damaged or inaccessible due to the Lahaina Wildfires. The Lahaina Recreation Center, Waiee Park Recreation Center, Kamehameha Iki Park, and Lahaina Banyan Court are all located south of the Project Sites. Paunau Park and Kelaweia Mauka Makai Park are located east or northeast of the Project Sites. Ukumehame Firing Range and Wahikuli Terrace Park are located at the northern end of Lahaina. These recreational facilities are all located within 1.5 miles of either Project Site. Paunau Park is the closest recreational property to either site and is located approximately 1,100 feet northeast of David Malo Circle and 2,400 feet east of Piilani Homes (County of Maui Department of Parks and Recreation, n.d.).

Educational Facilities

The State Department of Education has four public schools in the Lahaina area that make up the department's Lahainaluna Complex. This consists of Lahainaluna High School located above (mauka of) the Lahaina Bypass and Lahaina town. Lahaina Intermediate School is located adjacent to this high school. Nahienaena Elementary School is located adjacent to both the high school and intermediate school. King Kamehameha III Elementary School was located in the town about 0.5 miles south of David Malo Circle. Due to the wildfire, a new site for this school is being evaluated which may likely be located outside of the town.

Police and Fire Protection

The County of Maui Police Department serves Maui County which consists of six districts and three islands: Maui, Lanai, and Molokai. Four police stations are located on Maui Island: Wailuku Main Station, Hana Station, Kihei Station, and Lahaina Station. Police service in the Lahaina area is provided by the department's Lahaina Station located at the northern end of the town at 1850 Honoapiilani Highway.

The County Department of Fire and Public Safety provides emergency and non-emergency services for the islands of Maui, Molokai, Lanai, and Kahoolawe. There are 14 fire stations throughout Maui County, 10 of which are located on Maui Island. The County's Station 3 Lahaina is also located in the northern end of the town at 1860 Honoapiilani Highway.

Medical Services

Emergency and non-emergency medical transport services on Maui is provided by American Medical Response. Prior to the Lahaina Wildfires, Maui Medical Group provided medical services within Lahaina Town. Currently, the nearest medical services are located in Napili, approximately 8 miles

north of Lahaina. The majority of medical services and largest medical center on the island is located approximately 11 miles east of Lahaina in Wailuku. Travel between Lahaina is an approximately 30-minute, 22-mile drive via Honoapiilani Highway (Route 30).

Social Services

Social services on Maui are provided by both the State Department of Human Services and County Department of Human Concerns. These services include adult and child protective services, the Supplemental Nutrition Assistance Program (SNAP), vocational rehabilitation, youth services such as foster care and juvenile justice, affordable medical insurance, and services addressing homelessness and affordable housing. The HPHA is a main provider of public housing on Maui.

3.9.2 Potential Impacts

Recreational Facilities

Proposed Action. Demolition activities would occur within the HPHA properties and there are no recreational facilities adjacent to these housing sites that could be affected. Necessary BMPs would be incorporated into design plans to minimize any nuisance effects from this activity such as those related to fugitive dust emissions, noise, etc. Additionally, recreational activities at any sites within Lahaina are likely ceased or reduced while clean-up and recovery efforts take place. Therefore, the Proposed Action is not anticipated to have a short- or long-term impact on these recreational facilities or any activities occurring at them.

No Action Alternative. The No Action Alternative would not have an impact on existing recreational facilities or activities because the present site conditions of both properties would continue.

Educational Facilities

Proposed Action. Demolition activities would occur within the housing sites and there are no educational facilities adjacent or in the immediate vicinity that could be affected. Necessary BMPs would be incorporated into design plans to minimize any nuisance effects from this activity such as those related to fugitive dust emissions, noise, etc. Therefore, the Proposed Action is not anticipated to have a short- or long-term impact on these educational facilities or any activities occurring at them.

No Action Alternative. The No Action Alternative would not have an impact on existing educational facilities or activities because the present site conditions of both properties would continue.

Police and Fire Protection

Proposed Action. The Proposed Action is not anticipated to have a short- or long-term impact on police or fire operations or their ability to service emergency calls. Demolition activities are fairly limited in the amount of activities occurring. At David Malo Circle, only minor remnant accessory structures remain to be removed. BMPs would be incorporated into design plans to address measures to minimize any nuisance effects such as those related to fugitive dust emissions, noise, etc. Therefore, the Proposed Action should not result in the need for police or fire protection services. No road closures are necessary for this work that may affect police staffing at their Lahaina station.

No Action Alternative. The No Action Alternative would not have an impact on existing police and fire facilities or operations because the present site conditions of both properties would continue.

Medical Services

Proposed Action. The Proposed Action would not add residences or population to the area that would increase the demand for medical services or impact roadways that might affect the provision of medical services. As such, the Proposed Action is not anticipated to impact existing medical services on Maui.

No Action Alternative. The No Action Alternative would have current site conditions continue and would therefore have no effect on medical services.

Social Services

Proposed Action. The Proposed Action would not add residences or population to the area that would increase the demand for social services. The Project would demolish damaged structures to prepare both sites for HPHA to replace public housing units that were lost to the Lahaina Wildfires. As such, the Proposed Action is not anticipated to negatively impact social services and would be of minor benefit to providing public housing in the future.

No Action Alternative. The No Action Alternative would have current site conditions continue and would not prepare either property for the rebuild or redevelopment of public housing at Piilani Homes and David Malo Circle. Therefore, the No Action Alternative would have an adverse impact on social services as these public housing units would remain lost to the Lahaina Wildfires.

3.10 SOCIO-ECONOMIC ENVIRONMENT

3.10.1 Affected Environment

According to the 2020 Census, the population of the State of Hawaii was approximately 1,455,271 and the population of County of Maui was 164,754. These were increases of approximately 94,970 for the state and 9,920 for Maui County since 2010 (United States Census Bureau, 2021). In 2020, the population of the Lahaina Census-Designated Place (CDP) was approximately 12,702 with 4,191 housing units. During this time, the median gross rent in Lahaina was approximately \$1,828, the average household size was 3.71, and there were 602 vacant units in the CDP (United States Census Bureau, 2023). As previously mentioned in Chapter 1, over 2,200 structures in Lahaina were destroyed with an estimated 86% of them being residential. Figure 3-10 shows the boundaries of the Lahaina CDP with respect to the HPHA housing sites.

In 2022, the medium household income of Lahaina residents was approximately \$83,443, lower than the statewide median of \$92,458. The poverty rate in Lahaina was 11.7%, which was higher than the statewide rate of 10.2%. Employment of Lahaina residents consisted mainly of private companies, with 77.4% of the population being employed by private companies. Approximately 7.5% of the Lahaina population was employed by a government agency.

In 2017, accommodation and food service accounted for approximately \$4.7 million of sales in the Lahaina CDP while retail accounted for approximately \$3.1 million. Prior to the Lahaina Wildfires, a number of retail stores, restaurants, and lodging establishments operated in Lahaina, including two shopping centers just makai of Piilani Homes. Most of these establishments are no longer in operation.

The West Maui Community Plan projected a population of approximately 33,754 by 2040, resulting in a needed increase of over 13,000 housing units for all of West Maui (County of Maui Planning Department, 2022).

Much of the Lahaina population have lost their homes, income, and other important aspects of life and the exact impact of the Lahaina Wildfires on these data points and projections have not yet been fully quantified. Therefore, this data should be taken only as a baseline prior to the wildfires in August 2023.

3.10.2 Potential Impacts

Proposed Action. The demolition, debris removal, and site stabilization at the David Malo Circle and Piilani Homes housing sites would not change the demographic characteristics of the area because there would be no currently inhabited residences displaced from the Proposed Action. The Project does not include constructing any new residences or visitor units which would increase the resident or visitor population in the area. Therefore, the project is not anticipated to have an impact on the area's present or future demographic projections.

Demolition activities would result in a minor short-term positive economic impact for Maui due to construction-related spending and employment. The demolition cost for this project would create several construction jobs during the duration of demolition activities over an approximately 6-month period, as well as support industries that service construction activities directly and indirectly. This includes direct jobs involved with demolition work, indirect jobs created as businesses directly involved with a project purchase goods and services in the local economy, and induced jobs created as workers spend their income on goods and services. Demolition activities would not negatively impact any commercial businesses or local economic drivers as most are not currently in operation.

Fiscal impacts would primarily involve additional tax revenue to the State from demolition activities under this project. Tax revenue sources for State government are composed primarily of general excise taxes (GET) on development costs and construction materials, along with corporate income tax, and personal income tax from construction workers. The project would generate a relatively small but positive amount of additional tax revenue to the State. County revenues generated are primarily limited to tax revenues on privately-owned property and improvements, and to a lesser extent fees charged for various activities such as water, sewer, permits, etc. Because the project site is located within the State-owned HPHA properties, no property tax revenue is currently generated for the County and this situation would continue with the project.

The Proposed Action would prepare both properties for future redevelopment options to replace the 60 low-income housing units lost to the Lahaina Wildfires. The potential of increasing housing units with redevelopment will also be evaluated. Income limits for individuals and families to qualify for public housing units such as those managed by HPHA are prescribed by HUD, as is set forth by HAR Chapter 17. Therefore, the Proposed Action would support future housing reconstruction having a beneficial effect for low-income families and individuals.

No Action Alternative. The No Action Alternative would not have an impact on the current social or economic environment as the present site conditions and uses would continue. Under this alternative, both sites would remain in disrepair and neither site would be assessed or cleared for future redevelopment. This would have a negative impact on housing conditions for low-income families and individuals consisting of those displaced by the wildfire and future individuals that could have qualified for such housing.



LEGEND

 Lahaina CDP

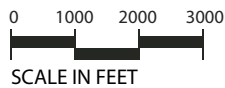


FIGURE 3-10
LAHAINA CENSUS-DESIGNATED PLACE (CDP)

3.11 GROUNDWATER RESOURCES

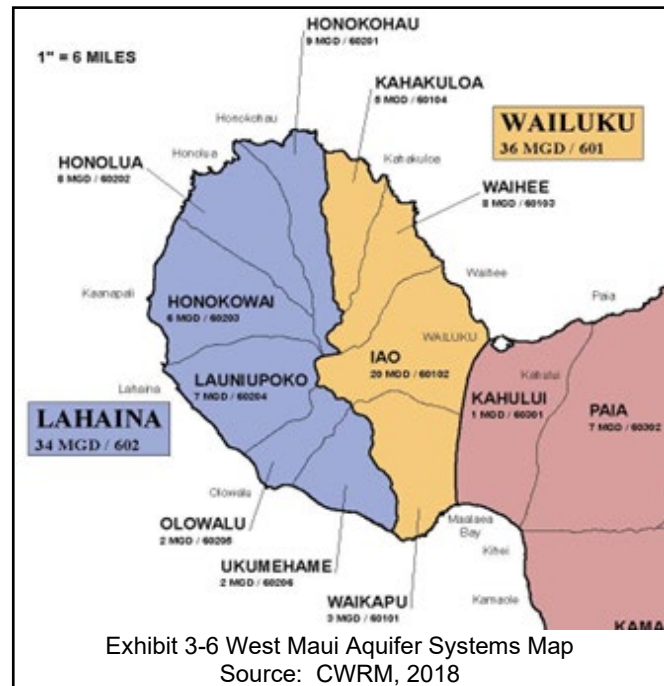
3.11.1 Affected Environment

Groundwater is one of the most important natural resources in Hawaii as it is the main source of freshwater statewide. Located beneath the water table within volcanic rock aquifers, groundwater provides about 99% of Hawaii's domestic water use and about 50% of all freshwaters used in the state (United State Geological Survey, 2016). Much of this groundwater comes from rainfall, fog drip, and irrigation water that isn't lost to runoff or evapotranspiration.

The State Department of Land and Natural Resources, Commission on Water Resource Management (CWRM) has established groundwater hydrologic units to provide a consistent basis for groundwater aquifer management. The State CWRM's Water Resource Protection Plan established an aquifer coding system classifying the State's aquifers by geology and water characteristics (State Commission on Water Resource Management, 2019). The coding system is comprised of Aquifer Systems located within larger State Aquifer Sectors which are delineated across the main Hawaiian Islands. An Aquifer Sector reflects an area with broad hydrogeological (subsurface) similarities while maintaining hydrographic (surface), topographic and historical boundaries. The Aquifer System is an area within a sector that is more specifically defined by hydrogeologic continuity, particularly hydraulic connections among aquifer types and units.

The Project area is located within the Launiupoko Aquifer System (60204) (Exhibit 3-7) which is within the larger Lahaina Aquifer Sector (602). Within this Aquifer Sector are six Aquifer Systems with an estimated sustainable yield of about 34 million gallons of water per day (MGD). Of the 34 MGD yield, The Launiupoko Aquifer System contributes approximately 7 MGD. Geographically, the sector comprises most of West Maui.

To protect water resources, the CWRM can designate ground or surface water management areas, which requires that a permit be acquired from the commission prior to the consumptive use of ground water. On June 12, 2022, the CWRM designated both Ground and Surface Water Management Areas within the Lahaina Aquifer Sector Area. The Launiupoko Aquifer System was designated as both a Ground and Surface Water Management Area (State Commission on Water Resource Management, 2022). This aquifer is also not a sole source aquifer as defined under the USEPA's Sole Source Aquifer Program (40 CFR Part 149).



3.11.2 Potential Impacts

Proposed Action. The Proposed Action involves demolition, soil testing, and site stabilization, and does not include the addition of uses which will increase the water demand to either housing sites. As

such, this work should not impact existing groundwater resources within the area associated with the Launiupoko Aquifer System or Lahaina Aquifer Sector.

The project would also include measures addressing the removal of potential heavy metals remaining from the wildfire that may still be present in soils. Remaining buildings at the Piilani Homes site would be evaluated for the presence of hazardous materials (e.g. asbestos) that would to be properly removed before demolition activities. Demolishing such structures and cleaning up areas would have a positive environmental benefit to the underlying aquifer by removing potentially hazardous materials that may infiltrate into the groundwater through open landscaped areas.

No Action Alternative. The No Action Alternative would have no change from the current site conditions. The No Action Alternative could result in some negative impacts to groundwater resources if hazardous materials remain on either site, are not removed, and are able to infiltrate into the groundwater.

3.12 SURFACE WATERS AND WATER QUALITY

3.12.1 Affected Environment

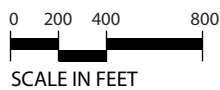
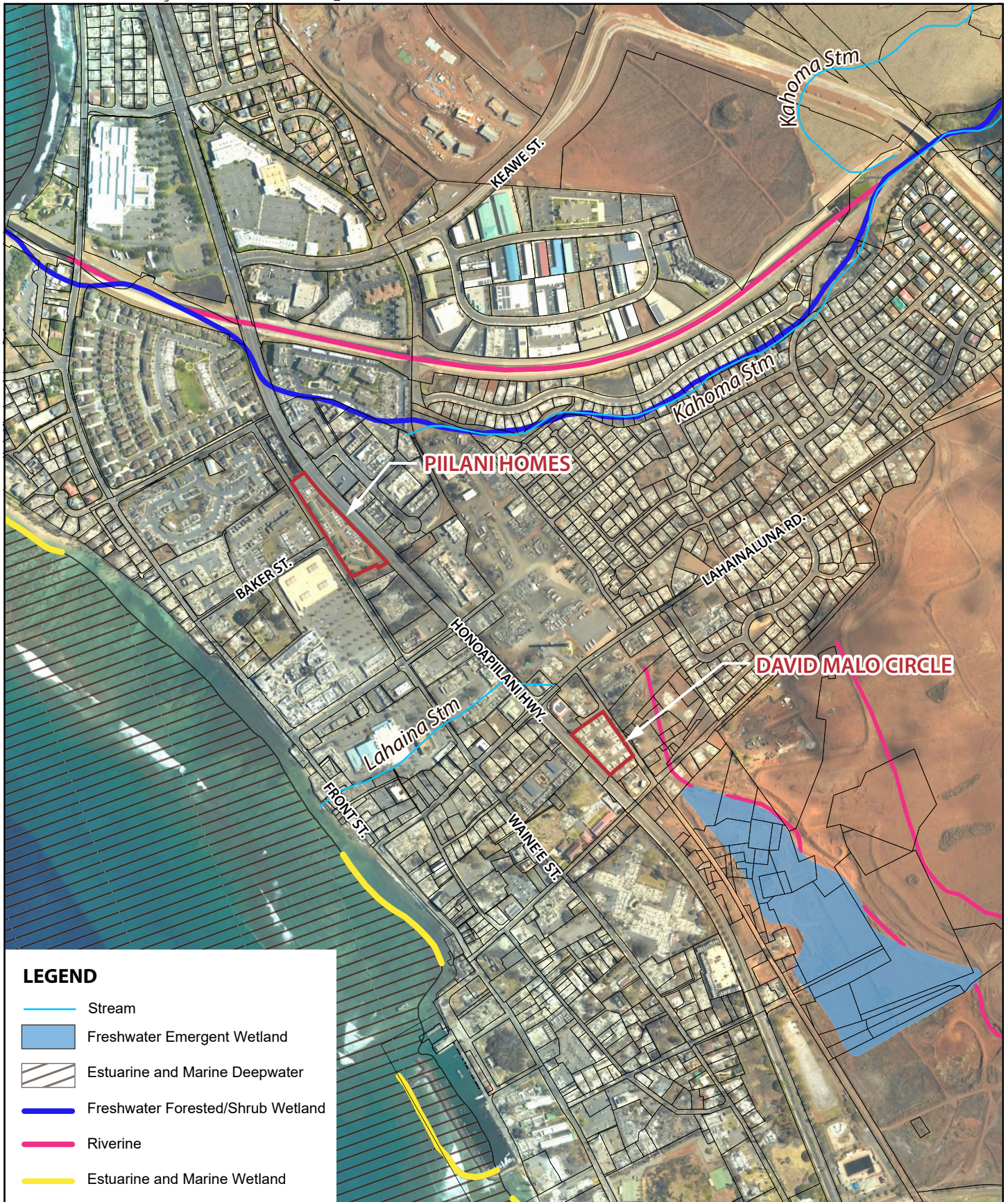
There are no perennial or intermittent streams present within either housing site. An intermittent tributary of Lahaina Stream runs between these sites and terminates at the ocean just south of Lahaina Center. This intermittent stream is located approximately 600 feet northwest of the David Malo Circle property and 1,200 feet southeast of the Piilani Homes property. Northeast and mauka of the project area are multiple tributaries of Lahaina Stream and Kahoma Stream (State Department of Land and Natural Resources, Division of Aquatic Resources, 2008).

There are no identified wetlands within either property, however, there are multiple wetland resources found in and around Lahaina Town. Southeast of both properties are Riverine and Freshwater Emergent Wetland resources as identified by the USFWS. These resources are approximately 300 feet east of the David Malo Circle property. Along the coast of Lahaina Town are identified Estuarine and Marine Wetland and Deepwater resources, approximately 1,000 feet west of the Piilani Homes property and 1,500 feet west of the David Malo Circle property (United States Fish and Wildlife Service, 2019). Figure 3-10 identifies these surface waters in the area. Additionally, the area was designated by the CWRM as both a Ground and Surface Water Management Area, as previously discussed in Chapter 3.11.

3.12.2 Potential Impacts

Proposed Action. The project would involve demolishing remaining buildings or accessory structures, removing debris, and stabilizing the properties to prevent erosion. There are no identified streams or wetlands within either property, therefore, the Proposed Action would not involve any work within or across existing streams or drainageways or result in the discharge of materials into such waters. Additionally, the demolition work would include debris removal, soil sampling, and BMPs to manage both erosion and the potential for hazardous material and pollutants from being discharged. Once the Proposed Action is complete, any potentially hazardous materials on either site would have been removed. Thus, this work should have an overall positive impact on surface water and water quality.

No Action Alternative. The No Action Alternative is not anticipated to have an impact on nearby surface waters or water quality as the present site conditions and uses would continue. However, if there are remaining hazardous materials within the project areas, there is a potential for them to be transported and discharged into surface waters through stormwater runoff.



**FIGURE 3-11
STREAMS AND WETLANDS MAP**

3.13 MARINE RESOURCES

3.13.1 Affected Environment

According to NOAA, there are identified coral reefs along the shoreline of Lahaina Town extending from the Mala Boat Ramp at the north end of Lahaina to the Puamana Community at the south end of Lahaina (National Oceanic and Atmospheric Administration, 2002). The offshore waters of Lahaina are also an Ocean Recreation Management Area (ORMA) as designated by the DLNR Division of Boating and Ocean Recreation (DOBOR) and a NOAA Marine Protected Area for the protection of Humpback Whales around the island of Maui (State Department of Land and Natural Resources Division of Boating and Ocean Recreation, 2024).

Existing Marine Habitat

In 2018, NOAA released a status report on the condition of coral reefs within the Hawaiian Islands (National Oceanic and Atmospheric Administration, 2018). The report listed local impacts from fishing and land-based pollution sources and global impacts from climate change and ocean acidification as being the largest threats to healthy coral reefs in Hawaii. At this time, the climate, corals/algae, and fish conditions for Maui Nui (the islands of Maui, Molokai, Lanaai, and Kahoolawe) were considered impaired.

Since the Lahaina Wildfires in 2023, research to determine the impact of the fires on the health of marine resources has been ongoing. While contaminants such as lead and copper have been found in water samples, concentrations have been decreasing and were never found to be present at harmful levels. Concentrations of arsenic in water were found to be unaffected by the fires. Although contaminants were found to be at safe levels within the ocean, testing to determine toxin levels within nearby fish populations is ongoing (U.S. National Science Foundation, 2024).

The HPHA conducted an informal consultation with the USFWS via its IPaC resource on May 24, 2024. The results of the IPaC consultation were the potential presence of 17 total listed species for both Project sites and no critical habitats within either project site. The only listed marine species resulting from the IPaC consultation was the Endangered Hawksbill Sea Turtle (*Eretmochelys imbricata*).

Essential Fish Habitat Information

The Magnuson-Stevens Fishery Conservation and Management Act (MSA) as amended by the Sustainable Fisheries Act of 1996, establishes procedures for conserving and enhancing essential fish habitats (EFH), or fish habitats with water and substrate necessary for fish spawning, breeding, feeding, or growth. The MSA requires federal agencies to consult with the National Marine Fisheries Service (NMFS) on all actions or Proposed Actions that they authorize, fund, or undertake that may adversely affect EFHs.

There are no identified EFHs within either housing project sites or in the immediate vicinity because these properties include former public housing sites (damaged from wildfire) located away from the shoreline and along the highway. However, there are designated EFHs off the coast of Lahaina which are identified in Table 3-2. It should be noted that these EFHs are designated for most of the waters surrounding the Hawaiian Islands.

**Table 3-2 EFH and Fishery Management Plan (FMP)
Designations Relevant to the Project Area**

Species / Management Unit	Lifestage(s) Found at Location	Management Council	FMP
All Pelagic Fisheries	Eggs/Larval, Juvenile Adult	Western Pacific	Fishery Ecosystem Plans for Pacific Pelagic Fisheries
Amberjack / Black Jack / Sea Bass	Eggs, Post-Hatch	Western Pacific	Bottomfish and Seamount Groundfish
Blue Stripe Snapper / Gray Jobfish	Eggs, Post-Hatch, Post-Settlement/Sub-Adult/Adult	Western Pacific	Bottomfish and Seamount Groundfish
Giant Trevally	Eggs, Post-Hatch, Post-Settlement/Sub-Adult/Adult	Western Pacific	Bottomfish and Seamount Groundfish
Kona Crab	Eggs/Larval, Juvenile/Adult	Western Pacific	Bottomfish and Seamount Groundfish
Main Hawaiian Islands Coral Reef Ecosystem	ALL	Western Pacific	
Pink Snapper	Eggs, Post-Hatch	Western Pacific	Bottomfish and Seamount Groundfish
Red Snapper / Longtail Snapper / Yellowtail Snapper / Pink Snapper / Snapper	Eggs, Post-Hatch	Western Pacific	Bottomfish and Seamount Groundfish
Silver Jaw Jobfish / Thicklip Trevally	Eggs, Post-Hatch	Western Pacific	Bottomfish and Seamount Groundfish

Source: EFH Mapper Report (NOAA Fisheries, 2021)

3.13.2 Potential Impacts

Proposed Action. The Proposed Action would take place approximately 1,000 feet inland from the shore at Piilani Homes and approximately 1,500 feet inland at David Malo Circle. This action just includes demolition of remaining structures so that the sites can be prepared for future reconstruction, it would not include the addition of any impermeable surfaces and would include BMP measures for demolition work. Therefore, the Proposed Action would not create additional runoff and would minimize the discharge of sediments or waste into the ocean from either site. The Proposed Action does not add new housing units or uses that might attract tourists and is therefore not anticipated to increase recreational activity in the ocean or nearby beaches that might affect marine resources.

Finally, the action alternative would involve testing the remaining soil and removing contaminated soil, which would reduce the likelihood that any runoff that reaches the shoreline contains harmful contaminants remaining on the housing sites from the Lahaina Wildfires. The Endangered Hawksbill Sea Turtle would not be affected by demolition activities that are located well inland from the shoreline. The Proposed Action would have a small beneficial effect on marine resources from the removal of potential contaminants remaining on the housing sites. Demolition work should have no effect on marine resources, the Endangered Hawksbill Sea Turtle, or EFH.

Essential Fish Habitat and Section 7 Determinations

Under the Magnuson-Stevens Fishery Conservation and Management Act (16 USC §1801 et seq.), consideration of the Project's potential effect on EFH was conducted by HPHA as part of the preparation of this Draft EA. This Draft EA is also serving to facilitate consultation with the National

Marine Fisheries Service as part of the EFH process for which the Proposed Action would have no effect on EFH.

The NMFS' EFH Mapper was consulted to determine the potential of the Proposed Action to negatively impact existing EFH as designated by the NMFS. There were no identified EFH or Habitat Areas of Particular Concern (HAPC) at either Project location; however, there are designated EFHs in nearshore waters which were identified in Table 3-2. The demolition and site stabilization included in the Proposed Action takes place at least 1,000 feet inland from these waters and would remove impermeable surfaces. Therefore, the Project should not increase stormwater runoff from either site. BMPs would ensure that runoff and any potential pollutants related to the demolition activities are contained on site. Additionally, the Proposed Action would reduce the long-term potential for contaminants from either site to reach designated EFH by testing for and removing contaminants that may remain in untested soils.

Therefore, HPHA has determined that the area of the Project's impact is mainly terrestrial, and the Proposed Action consist of just demolition activities would have "no effect" on designed EFHs or HAPC. Potential effects from demolition activities would be further minimized through the use of BMPs while yielding short- and long-term benefits by removing potential contaminants remaining at these housing sites from the wildfire.

Section 7 consultation under the Endangered Species Act (ESA) of 1973, as amended (16 USC §1531 et seq.) was also conducted by HPHA for this project. Informal consultation initiated under this process was conducted in a November 25, 2024, letter submitted to the USFWS (Appendix E). HPHA determined that demolition activities associated with this Proposed Action would have "no effect" on the endangered Hawksbill Sea Turtle (*Eretmochelys imbricata*). The only identified marine species within the area of the Proposed Action is the endangered Hawksbill Sea Turtle according to the USFWS IPaC resource. As previously discussed, this sea turtle does not occur on the housing sites or in the immediate vicinity because these properties are located well inland from the shoreline with a previously highly urbanized area within Lahaina town (prior to the wildfire).

No Action Alternative. Under the No Action Alternative, present site conditions would continue. Therefore, in the event that soils onsite are contaminated and stormwater runoff reaches the shoreline, the No Action Alternative may have long-term adverse effects marine resources.

3.14 HISTORIC AND CULTURAL RESOURCES

3.14.1 Affected Environment

Lahaina Historic District

Lahaina was once the capital of the Hawaiian Kingdom. The Lahaina Historic District was established as a National Historic Landmark (NHL) in 1962 and encompasses downtown Lahaina, also extending to include one mile of offshore waters. Lahaina was a favorite site of Hawaiian royalty and the primary landing site for whaling ships and missionaries. The Wainee Church, later renamed Waiola Church, was established in 1823 and attended by Hawaiian royalty while Lahaina was the capital. Waiola Cemetery adjoining the church later became a burial ground for Hawaiian monarchs and their advisors. Other notable historic buildings which contribute to the character of the Lahaina Historic District include the remains of the Lahaina Fort, the Baldwin House, the U.S. Seamen's Hospital, the Pioneer Mill, and the Wo Hing Society Hall. It is bound on its mauka end by Mill Street and Honoapiilani Highway, Kenui Street and Ala Moana Street on its northern end, and Front Street on its southern boundary (National Park Service, 2019). Both housing sites are located within the Lahaina Historic District.

Area of Potential Effect

The Area of Potential Effect (APE) consists of both housing developments' properties. David Malo Circle is located at 723 Mill Street, Tax Map Key (TMK) (2) 4-6-010:028, and Piilani Homes is located at 1028 Waivee Street, TMK (2) 4-5-007:005. The property containing David Malo Circle is 1.56 acres and the property containing Piilani Homes is 2.45 acres. The total APE thus consists of 4.01 acres.

Identification of Existing Historic Properties

Existing historic properties were identified based upon prior studies and consultations by HPHA with the State Historic Preservation Division (SHPD) along with a new assessment of architectural considerations based upon the impact from the wildfire conducted by Mason Architects, Inc. (MASON).

The Environmental Review documents completed by HHF Planners in 2021 and 2023 for the repair and rehabilitation of David Malo Circle and Piilani Homes included architectural reconnaissance level surveys (ARLS) completed by Fung Associates, Inc. (FAI) in 2015 and 2021 for David Malo Circle and Piilani Homes, respectively. The Environmental Review process included consultation with SHPD which indicated that repair and rehabilitation improvements at either housing project would have "no adverse effect", provided HPHA implemented certain minimization measures during the improvements. Recommended minimization measures included: 1) those for architectural improvements to existing buildings at Piilani Homes; and 2) those addressing ground disturbance at both housing sites.

David Malo Circle

The FAI 2015 RLS determined that the David Malo Circle housing development did not meet National Register of Historic Places (NRHP) significance criteria. The FAI study determined that this housing project was reflective of HUD's impetus in the 1960s to integrate public housing into surrounding communities as well as the shift in housing project design from the institutional Zeilenbau plan to that of a suburban neighborhood. However, later rehabilitation efforts for the housing project resulted in the loss of integrity of materials, design, and workmanship for buildings. The David Malo Circle housing development was thus previously determined as not meeting NRHP criteria and subsequently had no historic architectural sites on the property.

Piilani Homes

The FAI 2021 RLS determined that Piilani Homes at that time was deemed eligible for the National Register of Historic Places (NRHP) under Criteria "A" for its association with the history of the Hawaii Housing Authority and the efforts undertaken by the sugar industry to house its retired workers in the late 1960s and 1970s, and Criteria "C" for its architectural significance as an early 1970s elderly public housing project which included a central garden layout.

Within the Pi'ilani Homes development, four (including the community building) of the original nine buildings along with a pavilion were destroyed by the wildfire and debris remaining at their foundations have been removed by the USACE.

Updated Evaluation by Mason Architect, Inc.

A site visit to both properties was conducted by MASON in September 2024 to assess present conditions and evaluate the remaining historic significance of these housing sites given the level of damage from the wildfire. A copy of their evaluation memo is included in Appendix D.

Based upon MASON's site visit, the Piilani Homes housing development was found to have a loss of integrity to the degree that the site would no longer be eligible for the NRHP. Findings from the site visit are summarized below:

- The location integrity is retained.
- The site setting is not retained where debris cleanup has altered and removed the original landscaping. Further, original landscaping unaffected by the fire has either died or become overgrown and covered in weeds.
- Design integrity of the overall neighborhood is not retained as the garden layout and central landscaped mall have been altered due to the loss of structures which comprised its mauka, makai, and northwestern edges. Additionally, the design consistency identified in FAI's survey is no longer discernable with close to half of the original buildings gone.
- The workmanship of the development is partially retained, with the method of construction still being discernable in the remaining buildings.
- The integrity of feeling has not been retained due to the loss of buildings and landscaping as well as the vacancy of remaining buildings.
- The integrity of association is partially retained as the site is still under the ownership of the HPHA and remains tied to Hawaii's public housing. However, only about half of the buildings remain and they are currently unoccupied.

3.14.2 Potential Impacts

Proposed Action. Based upon the updated findings and evaluation from MASON, the proposed demolition of remaining structures at both Piilani Homes and David Malo Circle to allow for their future redevelopment should have "no adverse effect" on a historic property under Section 106 regulations of the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC § 470). Neither Piilani Homes nor David Malo Circle are now considered eligible for the NRHP due to the damage caused by the Lahaina Wildfire. Further, the Proposed Action should not adversely affect the Lahaina NHL district as these two housing sites are not considered to be contributing features of the district due to their lack of historic integrity. With all buildings at David Malo Circle now destroyed by the Lahaina Wildfire, demolition of remaining accessory structures on this property should have no effect on historic architecture. Similarly, demolition of remaining structures at Piilani Homes should have "no effect" on historic architecture as these structures are no longer be eligible for the NRHP under Section 106 regulations.

If demolition work involves ground disturbance, HPHA would implement the measures agreed to under the prior Environmental Reviews of 2021 and 2023 to address potential subsurface historic sites for both housing projects. This would include implementation of a SHPD approved archaeological monitoring plan and other documentation requirements. Based upon these minimization measures, demolition work requiring ground disturbance would have "no adverse effect" on historic properties (subsurface archaeology) under Section 106 regulations.

Under HRS Section 6E-8, this demolition work would have a "no historic properties affected" determination based upon previous consultation with SHPD as part of HPHA's Environmental Reviews for repair and rehabilitation improvements (SHPD DOC NO: 1509JL929). SHPD made this determination subject to the following conditions being met which would be implemented for the Proposed Action's activities:

- Implementation of the SHPD-accepted archaeological monitoring plan for all ground disturbance;
- Submit detailed plans, specifications and a detailed scope of work once the plans have been developed;
- Information (maps, photos, addresses) regarding locations where mature trees (larger than 6 inches in diameter) associated with buildings or structures that are 50 years of age or older are to be removed, will be submitted to SHPD for review, comment, and meaningful consultation;
- Submit a TMK map showing the full extent of the project area within the affected parcel/s;
- Description and photographs of current vegetation cover and condition of the project area, including structures, roads, wall or other features within the project area;
- Copies or dates of previously approved permits, survey reports, and/or prior SHPD review letters that pertain to the property.

Section 106 Consultation (NHPA)

Section 106 consultation for this project was conducted by Bowers + Kubota Consulting, Inc. to solicit input from organizations and the general public in compliance with the NHPA. The consultation process involved distributing a Section 106 consultation letter with supporting project information and documentation to relevant parties and requesting their written comments within 30 days. A notification and request for comments within 30 days was also published in the State Office of Planning and Sustainable Development (OPSD) Environmental Review Program's October 8, 2024, edition of *The Environmental Notice*. Section 106 consultation correspondence is provided in Appendix F.

A comment letter was received from the Historic Hawaii Foundation in response to the consultation letter. A summary of their comments is provided below:

- Agree that both David Malo Circle and Piilani Homes are no longer eligible for listing in the National Register of Historic Places due to the destruction caused by the Lahaina Wildfires.
- Concur that both housing sites are located within the boundary of the Lahaina National Historic Landmark (NHL) District but were not contributing to the historic significance of the NHL.
- Agree that the demolition of remaining structures within the two housing parcels would not have an adverse effect to historic properties.
- Agree that demolition and ground disturbing work should comply with archaeological monitoring plans as approved by SHPD.
- Commented that any redevelopment plans should be compatible and harmonious with the NHL character, as required by the Secretary of the Interior's Standards for the Treatment of Historic Properties. HHF requested to be included as a consulting party when redevelopment plans are proposed in order to assess the effect on the NHL.
 - *HPHA will address NHL character as part of future redevelopment plans and include HHF as a consulting party.*

Determination of Effect

HPHA serving as the authorized Certifying Officer under the U.S. HUD has determined that the proposed undertaking will have "no adverse effect" on historic properties subject to the conditions previously identify by SHPD. As previously discussed, demolition activities would have no effect on historic architecture associated with these housing sites because they are not eligible for the NRHP.

The conditions proposed by SHPD and agreed to by HPHA would minimize potential effects on archaeology (subsurface sites) resulting in the no adverse effect determination.

In a letter dated December 18, 2024, SHPD concurred with the proposed determination that the Project will have “no adverse effect” on historic properties (See Appendix F). Archaeological monitoring will be conducted as is requested in SHPD’s concurrence letter and pursuant to HAR § 13-279-4 governing standards for Archaeological Monitoring Plans (AMP). Written notification will be submitted to SHPD via email and HICRIS at the start of archaeological monitoring. An archaeological monitoring letter reporting findings of the monitoring will be submitted within 30 days of the monitoring’s completion for SHPD’s review and acceptance.

No Action Alternative. As previously discussed, neither site in their current conditions is eligible for the NHRP. Thus, the No Action Alternative would not have short- or long-term impacts on historic properties because the current site conditions would continue.

3.15 SECONDARY AND CUMULATIVE EFFECTS

3.15.1 Secondary Effects

Secondary effects, or indirect effects, are effects caused by a project that occur later in time or farther removed in distance than direct impacts but are still reasonably foreseeable. Such effects may include impacts on environmental resources or public facilities that occur from a project’s influence on land use. Secondary impact assessments are concerned with impacts that are sufficiently “likely” to occur and not with the speculation of any impact that can be conceived of or imagined.

Proposed Action. The Proposed Action would not result in significant secondary effects on the physical or social environment in the Project area. It would not involve changes to the resident population or visitor population as activities only involve demolition of remaining structures at these housing site. The demolition work would generate short-term jobs to fill the needs of the demolition, debris removal, and site stabilization efforts and does not include any construction or changes that would result in permanent in-migration or negative impacts to the current physical or social environment. Soil sampling is also included in the activities to identify and address any hazardous pollutants that may be present following the Lahaina Wildfires.

No Action Alternative. The No Action Alternative is not expected to have secondary effects to the physical or social environment of the Project area because present site conditions would continue. However, if hazardous pollutants are present at either of the Project sites, these conditions would continue until they are identified and removed. Therefore, the No Action Alternative may result in negative secondary effects on the Project area.

3.15.2 Cumulative Impacts

Cumulative impacts are typically defined as the effects on the environment that result from the incremental impact of a project when added to past, present, and reasonably foreseeable future actions within the study year. Cumulative impacts can result from individually minor, but collectively significant actions, taking place over a period of time.

David Malo Circle was first constructed and occupied in 1966 and was comprised of 18 housing units on approximately 1.6 acres. David Malo Circle consisted of eight one-story duplexes with one-, two-, and three-bedroom units and one two-story duplex with four-bedroom units. Piilani Homes was first constructed and occupied in 1970 and was comprised of 42 housing units on 2.5 acres. Piilani Homes consisted of eight one-story apartment buildings which contained studio and one-bedroom units as well as a single-story community center and laundry room. The construction and operation of these housing projects does not appear to have caused significant impacts to the Project area as previously discussed in this chapter.

Proposed Action. The timeframe for this Proposed Action is about one year with estimated completion of work by the end of 2025. There are no other known major developments or activities planned within this timeframe adjacent to these housing sites or in the immediate vicinity that may result in significant cumulative impacts. Most other property owners are working toward reconstruction options and permitting that may take time. Therefore, the demolition of remaining structures at HPHA's housing sites would not contribute to a significant cumulative impact on the surrounding environment.

No Action Alternative. The No Action Alternative would include no changes to the current site conditions and no expenditure or commitment of resources and is therefore not expected to cause a change in cumulative impacts to the physical or social environment from current site conditions.

3.16 UNAVOIDABLE ADVERSE EFFECTS

The previous sections of this chapter have addressed the relevant potential and expected environmental impacts as well as the minimization measures and BMPs associated with the Proposed Action and the No Action Alternative. Based on these results and discussions, there are no unavoidable adverse environmental impacts associated with the Proposed Action.

CHAPTER 4 CONFORMANCE WITH FEDERAL LAND USE PLANS AND POLICIES

4.1 COASTAL ZONE MANAGEMENT (CZM) ACT of 1972

The U.S. Congress noted in the CZM Act of 1972 (16 USC § 1451 et seq.) a national interest in the effective management, beneficial use, protection, and development of the coastal zone. In Hawaii, the entire state falls within the coastal zone boundary with few exceptions. The CZM Act states that federal actions, such as the use of federal funds, are required to be consistent with the CZM Act and the enforceable policies of federally approved State program to the extent practicable.

Hawaii's CZM Program was enacted in 1977 through HRS Chapter 205A and is administered by the State Office of Planning and Sustainable Development (OPSD). Consultation with the State OPSD, Hawaii CZM Program determined that they no longer review any HUD assistance programs, including Community Development Block Grants, and housing programs such as the Public Housing Capital Fund. Applicants for HUD assistance activities are no longer required to obtain CZM federal consistency approval based upon a June 24, 2004 letter (Ref. No. P-10520) from the State Office of Planning to HUD. Therefore, the Proposed Action consisting of demolishing remaining structures on the two housing projects are not subject to Hawaii's CZM federal consistency review.

Other CZM regulations such as the Special Management Area and Shoreline Setback provisions which are administered by the Counties are still valid and would apply to HUD assisted projects. The Proposed Action would be subject to the County of Maui's regulations associated with their Special Management Area (SMA) regulations. As previously discussed in Section 1.7, this demolition work would be an exempt action under the SMA regulations.

In a comment letter the State Office of Planning and Sustainable Development dated September 27, 2024, they requested consideration of the impacts of the Proposed Action on ecological, recreational, open space values, coastal hazards, etc. and to evaluate how the Project conforms to the Hawaii CZM Program's objectives and policies.

Proposed Action. The Proposed Action does not require CZM federal consistency review the State OPSD because it involves HUD assistance programs. The project would be consistent with pertinent CZM objectives and policies as the work only involves demolishing remaining structures on the two housing projects that were severely damaged by the Lahaina Wildfire. A summary of the project's consistency is provided below.

Chapter 205A – Coastal Zone Management Program: Objectives & Policies

The following section provides a discussion on the Proposed Action's consistency with the applicable CZM objectives and policies.

(1) Recreational Resources

Objective: *Provide coastal recreational opportunities accessible to the public.*

Policy:

(vi) *Adopting water quality standards and regulating point and nonpoint sources of pollution to protect, and where feasible, restore the recreational value of coastal waters;*

Discussion: While the Proposed Action does not deal directly with recreational resources, it will comply with water quality standards and include measures to regulate point and nonpoint sources of pollution, both in the BMPs that are implemented during demolition activities and by the removal of potential hazardous materials.

(2) Historic Resources

Objective: *Protect, preserve, and where desirable, restore those natural and man-made historic and pre-historic 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;*
- (C) *Support state goals for protection, restoration, interpretation, and display of historic resources;*

Discussion: An evaluation of the historic architectural significance of the housing projects was completed for this project. Background research and on-site investigations indicated that, while Piilani Homes had previously been assessed as eligible for the NRHP under Criteria “A” and “C,” remnant structures on the property following the Lahaina Wildfires no longer meet significance and integrity criteria. Therefore, demolition of remaining structures at Piilani Homes would have no adverse effect on historic sites. Additionally, David Malo Circle was previously assessed as not being eligible for the NRHP and remains ineligible as all the structures on-site have been destroyed. Based upon HPHA’s prior consultations with SHPD for repair and rehabilitation improvements, it was agreed that various conditions would be implemented for work that involves ground disturbance at these two housing sites. With implementation of these conditions, work at these housing sites would have no adverse effect on historic properties.

(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:

- (B) *Ensure that new developments are compatible with their visual environment by designing and locating those 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;*

Discussion: The Proposed Action does not include any alteration of natural landforms or structures that will impact existing shoreline views. The project will not result in any new buildings or structures, and only includes demolition and site stabilization activities within each property.

(4) Coastal Ecosystems

Objective: *Protect valuable coastal ecosystems from disruption and minimize adverse impacts on all coastal ecosystems.*

Policy:

- (A) *Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;*

Discussion: The proposed Project will not impact any marine or coastal resources as all actions will be located inland of the shoreline. In addition, the Project sites do not contain any rivers, streams, or surface water resources, and thus will not result in any downstream effects to coastal ecosystems. To avoid any potential impacts to coastal resources, BMPs like described in previous chapters will be used during any necessary excavation and grading activities to minimize soil loss and erosion, thus preserving existing coastal water conditions. In addition, a main goal of the Proposed Action is to identify and remove and potentially hazardous materials that remain on the properties. Permanent sediment control measures will also be used once construction is complete as necessary.

(5) Economic Uses

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

Policies:

- (C) *Direct the location and expansion of coastal development to areas designated and used for that development and permit reasonable long-term growth at those areas, and permit coastal development outside of designated areas when:
 - (i) *Use of designated locations is not feasible;*
 - (ii) *Adverse environmental effects and risks from coastal hazards are minimized; and*
 - (iii) *The development is important to the State's economy;**

Discussion: The Project will prepare the properties to be reconstructed for their designated and original purpose of providing public housing for low-income families and individuals. The provision of low-income housing is important to the State as it alleviates the financial burden on residents and supports the State's housing supply. In addition, the Proposed Action includes measures to minimize adverse environmental effects from coastal hazards through the use of BMPs.

(6) Coastal Hazards

Objective: *Reduce hazard to life and property from coastal hazards.*

Policies:

- (A) *Develop and communicate adequate information about storm wave, tsunami, flood, erosion, subsidence, and point and nonpoint source pollution hazards;*
- (C) *Ensure that developments comply with requirements of the National Flood Insurance Program; and*
- (D) *Prevent coastal flooding from inland projects;*

Discussion: Included in this document is information regarding tsunami and flood risk, erosion, and potential pollution hazards, as well as minimization and mitigation measures where there may be impacts. The Project properties are within the FEMA's Flood Zone X, which is the lowest-risk flood area designated by FEMA. Implementation of the Proposed Action will not significantly change existing flood conditions or increase the vulnerability of the properties or surrounding area to flooding. Existing drainage patterns should not be significantly altered which generally flow in a makai direction utilizing existing drainage systems (inlets) toward the harbor and eventual discharge at the shoreline. Therefore, existing flood hazard conditions within the harbor facility along with other adjacent existing uses along the shoreline should not be changed or significantly impacted by the project.

(7) Managing Development

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

Policies:

- (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;*

Discussion: This document was prepared in accordance with HUD's NEPA requirements and includes an evaluation of short and long-term environmental impacts of the project. The environmental review process includes public review within comment periods as well as targeted outreach to special interest groups and organizations. Implementation of the proposed improvements will require State and County permits and approvals, as identified in Chapter 1.7. The overall environmental review as well as the permitting, review, and approval process is consistent with the following CZM policies for managing development.

(8) Public Participation

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

Policies:

- (A) Promote public involvement in coastal zone management processes;*

Discussion: Chapter 5 includes a discussion on the efforts undertaken to provide the community and agencies with an opportunity to review and comment on this project consistent with this policy. Early Consultation letters were distributed to various stakeholders soliciting their input in the preparation of this document. The publication and processing of this environmental document allows for information to be distributed to the public and for public participation to address comments and concerns associated with the project.

(9) Marine Resources

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

Discussion: The Proposed Action consisting of demolition activities at the two housing sites will include BMPs to minimize the discharge of sediment as part of stormwater runoff that would minimize effects and protect marine and coastal resources. The removal of remaining heavy metals and potential hazardous materials from these sites resulting from the wildfire would also have a beneficial effect in protecting marine and coastal resources.

No Action Alternative. The No Action Alternative would not affect the State's CZM policies because current site conditions would continue at both the David Malo Circle and Piilani Homes properties. However, leaving heavy metals and other potential hazardous materials on these sites resulting from the wildfire could allow for them to be discharged into coastal resources as part of stormwater runoff. Although most debris from destroyed structures have already been removed and remediated by the USACE's work in Lahaina, remaining hazardous materials could have a negative effect.

CHAPTER 5 PUBLIC AGENCY INVOLVEMENT, REVIEW, AND CONSULTATION

This chapter discusses the coordination regarding the Project with pertinent Federal, State, and County agencies.

5.1 EARLY CONSULTATION

5.1.1 Distribution of Consultation Letters

Consultation with various government agencies and community organization was undertaken to obtain information on agency requirements and comments about potential community issues so that they could be addressed in this Draft EA. Consultation efforts involved distributing a consultation letter with supporting project information and documentation to various parties and requesting their written comments. The early consultation period was initiated in September 2024, and recipients were asked to submit their comments within 30 days of receiving their letter and package. A listing of those parties consulted is below and those providing written responses have been identified with a “»” symbol. Copies of written comments received are included in Appendix A.

Federal Agencies

- Federal Emergency Management Agency (FEMA)
- National Oceanic and Atmospheric Administration (NOAA)
- U.S. Army Corps of Engineers (USACE), Pacific Oceans Division
- U.S. Department of the Interior
 - U.S. Geological Survey (USGS), Pacific Islands Water Science
 - » U.S. Fish and Wildlife Service (USFWS)
- U.S. Environmental Protection Agency (USEPA)
 - Pacific Southwest, Region 9
 - USEPA, Pacific Islands Office

State of Hawaii Agencies

- » Department of Accounting and General Services (DAGS)
- Department of Business, Economic Development and Tourism (DBEDT)
 - DBEDT, Land Use Commission (LUC)
 - » DBEDT, Office of Planning and Sustainable Development (OPSD)
 - » DBEDT, Hawaii Housing Finance & Development Corporation (HHFDC)
- Department of Defense (DOD), Hawaii Emergency Management Agency (HIEMA)
- Department of Education (DOE)
 - DOE, Maui Office
- Department of Hawaiian Home Lands (DHHL), Hawaiian Homes Commission
- Department of Health (DOH)
 - DOH, State Health Planning and Development Agency
 - DOH, Environmental Management Division
 - » DOH, Clean Air Branch (CAB)
 - DOH, Clean Water Branch
 - DOH, Safe Drinking Water Branch
 - DOH, Solid and Hazardous Waste Branch
 - DOH, Wastewater Branch

- Department of Land and Natural Resources (DLNR)
 - DLNR, Office of the Chairperson
 - DLNR, Aquatic Resources Division
 - DLNR, Aquatic Resources Division, Maui District
 - » DLNR, Division of Boating & Ocean Recreation (DOBOR)
 - » DLNR, Engineering Division
 - DLNR, Land Division
 - DLNR, Land Division, Maui District Branch
 - DLNR, Division of Water Resource Management
 - DLNR, Aha Moku Advisory Committee
 - DLNR, State Historic Preservation Division
- Department of Transportation (HDOT)
 - HDOT, Highways
- Hawaii State Legislature
 - Office of the Governor
 - » Senator Angus L.K. McKelvey
 - Representative Elle Cochran
- Office of Hawaiian Affairs (OHA)
 - OHA, Board of Trustees, Island of Maui

County of Maui Agencies

- Community Development Block Grant
- » Department of Environmental Management (DEM)
 - DEM, Solid Waste Division
 - » DEM, Wastewater Reclamation Division
 - DEM, Environmental Protection & Sustainability Division
- Department of Housing
- Department of Human Concerns
- Department of Planning
- Department of Public Works (DPW)
 - DPW, Development Services Administration
 - DPW, Engineering Division
 - DPW, Highways Division
- Department of Fire and Public Safety
- Department of Transportation
- Department of Water Supply
- Emergency Management Agency
- » Police Department
- Office of Economic Development
- Office of the Mayor
- Maui County Council
 - Office of Council Services
 - » Council Chair Alice Lee
 - Councilmember Tamara Paltin
- Maui Metropolitan Planning Organization

Utility Companies

- Hawaiian Telcom

- » Hawaiian Electric Company
- » Hawaii Gas Company
- Spectrum

Community Groups and Stakeholders

- Aha Moku o Maui, Inc.
- Kipuka Olowalu
- Na Aikane o Maui, Inc.

5.1.2 Summary of Comments Received

A summary of comments received from agencies and organizations (Appendix A) is provided below. Comments received were evaluated and addressed in various sections of this document as appropriate.

Federal Agencies/Organizations

- U.S. Fish and Wildlife Service (USFWS)
 - Provided information about the USFWS' online Information for Planning and Consultation (IPaC) and updated Section 7 consultation process.

State Agencies/Organizations

- Department of Accounting and General Services (DAGS)
 - The proposed Project does not impact any of DAGS' projects or existing facilities.
- Department of Business, Economic Development and Tourism (DBEDT), Office of Planning and Sustainable Development (OPSD)
 - The Coastal Zone Management (CZM) area is defined as the entire State under HRS Chapter 205A-1. Agencies shall consider ecological, cultural, historic, esthetic, recreational, scenic, and open space values, coastal hazards, and economic development in the implementation of CZM objectives. The Draft EA should evaluate how the proposed Project conforms to the Hawaii CZM Program's objectives and policies found in HRS Chapter 205A-2, as amended.
 - The Draft EA should identify and analyze impacts of alternatives under consideration and the negative effects of stormwater runoff and sedimentation to ensure that nearshore marine resources in West Maui are protected. This should include, but not be limited to:
 - Land characteristics related to flood and erosion prone areas,
 - The vulnerability of the nearshore environment to polluted stormwater runoff, and
 - Mitigation strategies to preserve surface water quality and limit impacts to downslope coastal ecosystems from polluted runoff.

Low Impact Development (LID) strategies are proven method in protecting the coastal environment and should be considered. OPSD recommends reviewing the 2023 LID Practitioners Guide for guidance on employable BMPs.

- The Draft EA should examine whether the Project area, including nearby roadways and properties, could be vulnerable to sea level rise (SLR). The Draft EA should include a map of at least a 3.2-foot SLR exposure area and evaluate potential adaptation measures and safeguards. OPSD recommended referring the 2017 Hawaii Sea Level Rise Vulnerability and Adaptation Report and the Hawaii SLR Viewer.

- DBEDT, Hawaii Housing Finance & Development Corporation (HHFDC)
 - No comments on the proposed Project.
- Department of Health (DOH), Clear Air Branch (CAB)
 - All project activities must comply with HAR §11-60.1 and an air pollution control permit must be obtained from the DOH Clean Air Branch if required.
 - The generation of visible airborne fugitive dust must be reasonably controlled. Activities occurring near residences, businesses, public areas, and major thoroughfares exacerbate potential dust concerns. Development of a dust control management plan is recommended.
 - Activities must comply with all provisions of HAR §11-60.1-33 on Fugitive Dust and it is strongly recommended that buffer zones be established for projects involving mixed land use.
 - Reasonable measures must be provided to control visible airborne fugitive dust from road areas during activities.
 - If the project involves potential asbestos and lead containing materials, contact the Indoor and Radiological Health Branch.
 - The creation of apartment buildings, complexes, and residential communities may increase the overall population in an area which may lead to more air pollution from vehicle exhaust. Vehicle exhaust includes airborne pollutants lung irritants, carcinogens, and greenhouse gases which can negatively impact human health and air quality. Vehicle idling times should be kept to three minutes or less and alternative transportation options should be considered and supported.
- Department of Land and Natural Resources (DLNR), Division of Boating & Ocean Recreation (DOBOR)
 - No objection to the proposed Project.
- DLNR, Engineering Division
 - No comments on the proposed Project.
- Hawaii State Legislature, Senator Angus L.K. McKelvey
 - Support for the Proposed Action and requested to expedite the process. Concern about the lack of plan to replace the lost housing units at the Project properties. Requested clarification on the next steps for the properties after the proposed Project.

County Agencies/Organizations

- Department of Environmental Management (DEM)
 - Requested that all re-usable materials be diverted recycling or other options to lessen burdens on the County landfills and resources.
 - If construction and/or demolition materials are expected to be disposed of at a County landfill, a C&D application must be submitted and approved prior to delivery to the local landfill. Customers must have a C&D Number and a valid landfill Disposal Permit and Account. The Solid Waste Division (SWD) should be immediately notified if there are significant revisions or changes to permitted C&D waste hauling.
 - Hazardous wastes are not accepted at County landfills but special wastes such as asbestos, contaminated soil, and canec may be permitted upon request.
- DEM, Wastewater Reclamation Division

- The County does not have sewer lines within either property. Sewer lines within both properties are privately owned and maintained.
- Existing private sewer lines may have been damaged by the fire and are likely to have contaminated water which should not be flushed into the County system. Sewer lines should be cleaned and assessed by a plumber or contractor to determine if they are structurally sound or should be replaced.
- Redevelopment of the property will require installation of a property sewer service manhole, which can assist with cleaning and assessing the existing system.
- County sewer lines serving Piilani Homes are inactive and expected to be repaired by the end of 2025. Lines serving David Malo Circle are currently active.
- Lahaina Wastewater Reclamation Facility (WWRF) has sufficient capacity to accommodate both properties if rebuilt as originally constructed. There may be capacity to add units, but it will need to be evaluated once the projects are defined.
- Police Department
 - At the time of comment (September 2024), there were no matters of concern from a police standpoint.
- Maui County Council, Council Chair Alice Lee
 - No objections to the Proposed Action. Requested that HPHA work with the community and review County recovery efforts to begin working on redevelopment plans.

Utility Companies

- Hawaiian Electric Company (HECO)
 - No objections to the Proposed Action but would require continued access to any existing easements or facilities in the Project properties. Requesting continued communication as the Project progresses.
- Hawaii Gas Company
 - At the time of comment (September 2024), the Hawaii Gas utility system was deenergized and nonfunctional. There are no Hawaii Gas utility lines in or around David Malo Circle, located at 723 Mill Street. There is a nonfunctional existing 4" XTC gas main line which runs adjacent to Piilani Homes along Waivee Street and through a portion of the parking lot at the north end of the property.

5.2 SECTION 106 CONSULTATION

In accordance with the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC §470), the HPHA engaged in consultations with relevant organizations regarding the historic significance of both the David Malo Circle and Piilani Homes properties, as previously discussed in Chapter 3.14.

Consultation Letters Distribution

Consultation involved distributing a Section 106 consultation letter with supporting project information and documentation to relevant parties and requesting their written comments within 30 days. A listing of the consulted parties is below and those providing written responses have been identified with a "»" symbol. Copies of written comments received and responses to these comments are included in Appendix F.

- Office of Hawaiian Affairs
- County of Maui, Department of Planning
- Aha Moku o Maui Inc.
- Association of Hawaiian Civic Clubs
- » Historic Hawaii Foundation
- Hui Iwi Kuamoo
- Lahaina Restoration Foundation
- Na Aikane o Maui, Inc.
- Kipuka Olowalu
- Paukukalo Hawaiian Homes Community Association
- Association of Hawaiians for Homestead Lands
- Kimokeo Foundation

Public Notification in *The Environmental Notice*

A notice of Section 106 consultation was published in the October 8, 2024 issue of the State Office of Planning and Sustainable Development, Environmental Review Program's (ERP) *The Environmental Notice* for the general public (See Appendix F). A 30-day comment period was provided under this publication. No comment letters were received from this publication.

5.3 DRAFT EA PUBLICATION FOR PUBLIC REVIEW

This Draft EA will be published in the State OPSD ERP's *The Environmental Notice* for the public review and comments. This Draft EA will also be published in the U.S. Department of Housing Urban Development's (HUD) HUD Environmental Review Online System (HEROS) and will be open to a 30-day public comment period.

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CHAPTER 7 LIST OF PREPARERS

Hawaii Public Housing Authority

Lisa Izumi, Project Engineer
Years of Experience: 27 years
Responsible for: Project Manager

Bowers + Kubota Consulting, Inc.

Ronald A. Sato, AICP, Senior Project Manager
M.A., Urban and Regional Planning, University of Hawaii at Manoa
B.S., Political Science, University of Hawaii at Manoa
Years of Experience: 34 years

Ty Shiramizu, AICP, Project Planner
M.A., Urban and Regional Planning, University of Hawaii at Manoa
B.A., Biology, University of Hawaii at Manoa
Years of Experience: 3 years

Mason Architects, Inc.

Polly Tice, Principal and Research Section Director
Responsible for: Principal-in-Charge

Annalise Shiraki, Architectural Historian
Responsible for: Historic Architecture

Element Environmental, LLC

Matthew Neal, Senior Vice President
Responsible for: Senior Environmental Scientist



APPENDIX A
Early Consultation

September 6, 2024

24A0090.00 / 24P-079

Sent via Email: fema-r9newsdesk@fema.dhs.gov

Ms. Johanna Johnson
Federal Emergency Management Agency
546 Bonney Loop, Bldg. 520
Fort Shafter, HI 96858

Subject: Pre-Assessment Consultation for a NEPA Environmental Assessment
State Hawai'i Public Housing Authority
Demolition of David Malo Circle and Pi'ilani Homes (Island of Maui)
Tax Map Keys: (2) 4-6-010:028 and (2) 4-5-007:005
723 Mill St. and 1028 Waine'e St., Lāhainā, Hawai'i, 96761

Dear Ms. Johnson:

Bowers+Kubota Consulting, Inc. (B+K) is supporting the State of Hawai'i (State), Hawai'i Public Housing Authority (HPHA) in preparing an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) for the proposed Demolition of David Malo Circle and Pi'ilani Homes (Project). This federal EA is being prepared because the Proposed Project includes the use of the U.S. Department of Housing and Urban Development (HUD) funds (grants or loans). Therefore, an EA for this project will be prepared in accordance with HUD's regulations prescribed under 24 CFR 50.31. Under the State environmental regulations Chapter 343, HRS and Title 11-200.1, HAR, demolition of structures are exempt Part 1 (De Minimus) activities under HPHA's exemption list. We are subsequently initiating preassessment consultation with your agency to obtain your comments that will assist us in the preparation of the EA document.

HPHA is seeking to demolish the remaining structures and remove debris from the David Malo Circle and Pi'ilani Homes housing projects, located in Lāhainā, Maui, as part of recovery efforts following the wildfire natural disaster that impacted the town of Lāhainā in August 2023 (Lāhainā Wildfires). David Malo Circle is located at 723 Mill Street, Tax Map Key (TMK) (2) 4-6-010:028, and Pi'ilani Homes is located at 1028 Waine'e Street, TMK (2) 4-5-007:005. The property containing David Malo Circle is 1.56 acres and the property containing Pi'ilani Homes is 2.45 acres. A location map is included for reference.

The David Malo Circle housing project consisted of 18 units within eight ground-level duplexes with one, two, and three bedrooms per unit and a single two-story duplex with four bedrooms. The Pi'ilani Homes housing project consisted of 42 dwelling units located throughout eight ground-level apartment buildings. These buildings contained studio and one-bedroom units. A single-story community center with a laundry room was available to serve the residents of the project. Figures showing these housing projects before and after the wildfire natural disaster are provided.

The purpose of the Project is to begin recovery efforts following the Lāhainā Wildfires by having these housing project sites cleared of debris and the removal of hazardous materials so that their future planning and redevelopment can commence. The Project would serve as an important first step to allow



Ms. Johanna Johnson
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for the future redevelopment of these sites to replace the total 60 low-income housing units lost due to the natural disaster. There are no redevelopment plans established for these housing sites at this time, but HPHA will evaluate redevelopment options to replace the 60 housing units.

Both housing sites were severely damaged by the wildfires with all existing buildings at the David Malo Circle site destroyed as shown on the figure included. The Pi'ilani Homes site had several buildings destroyed, but the condition of five buildings that still remain needs to be determined. Demolition efforts would involve demolishing remnant and remaining structures, the removal of ash and debris, soil sampling, and the stabilization of the sites to reduce erosion. Work would also include the removal of destroyed vehicles, unusable utilities, and removals of hazardous household materials based upon soil sampling and other site assessments conducted. All materials will be dampened and wrapped in industrial wrap before being transported to a debris site.

We kindly seek your input and comments during this preassessment effort being conducted. Please submit your written comments as provided below within 30 days of receipt of this letter.

Mr. Ronald A. Sato, AICP
Bowers + Kubota Consulting, Inc.
2153 North King Street, Suite 200
Honolulu, HI 96819-4554
Email: rsato@bowersandkubota.com

We thank you for your interest and participation in this Project. If you have any questions, please feel free to contact me at (808) 521-5361 or by email at rsato@bowersandkubota.com.

Sincerely yours,
Bowers + Kubota Consulting, Inc.

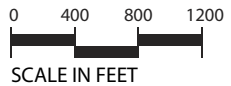
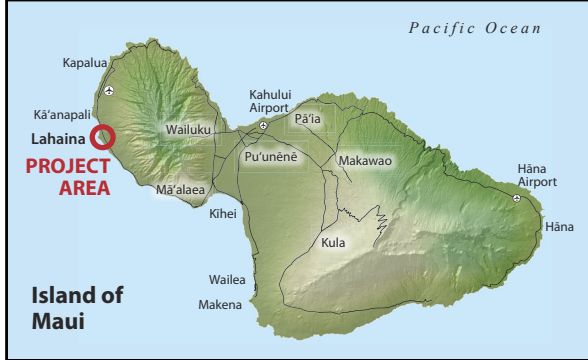


Ronald A. Sato, AICP
Sr. Project Manager

RS/TS:kn

Enclosures:
Location and Site Maps

CC: Lisa Izumi, HPHA



LOCATION MAP

March 2023



August 2023



March 2023



November 2023



Ronald Sato

From: Javar-Salas, Chelsie <chelsie_javar-salas@fws.gov>
Sent: Friday, October 11, 2024 2:02 PM
To: rsato@bowersandkubota.com
Subject: Technical Assistance for Pre-Assessment Draft Environmental Assessment for the Proposed Demolition of David Malo Circle and Pi'ilani Homes, Lāhainā, Maui
Attachments: IPaC Info Letter_Species List Instructions_PIFWO_20Apr2022_Final.pdf

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Dear Ronald A. Sato,

Thank you for the opportunity to provide comments on the pre-assessment Draft Environmental Assessment for the Proposed Demolition of David Malo Circle and Pi'ilani Homes Project located at 723 Mill Street (David Malo Circle: TMK (2) 4-6-010:028) and 1028 Waine'e Street (Pi'ilani Homes: TMK (2) 4-5-007:005), Lāhainā, Maui. The U.S. Fish and Wildlife Service (Service) has updated how we manage our technical assistance workload and process section 7 consultations.

We have streamlined portions of the consultation process. Your first step in our updated process is to obtain an Official Species List in our new Information for Planning and Consultation (IPaC) online tool, for which a link can be found at the box in top left corner of the this home page: <https://ecos.fws.gov/ecp/>.

After entering basic project information, including a map of the project (you can use the map drawing tool or upload a GIS polygon that contains the project area(s)), please navigate to request an Official Species List. In addition to creating your species list, this process automatically generates an ECOSphere Project in our system, facilitating our work on your project. Each submitted project is assigned a unique Project Code; please provide this Project Code in any correspondence with our office relating to the project.

Your IPaC-generated Official Species List will include all federally listed species, critical habitat, migratory birds, and wetland habitat that occurs, or may transit through, the project vicinity. For projects in Hawai'i, each species on your Official Species List page (links directly below it) provides the Service's recommended avoidance and minimization measures for that species. Our general avoidance and minimization measures for both animals and plants are provided at our website here: <https://www.fws.gov/office/pacific-islands-fish-and-wildlife/library>, please refer to them in the preliminary stages of project design.

A few IPAC tips:

- If you upload a polygon for your project area, please include all sites in a single file. Otherwise, you will get a project code for every site. To facilitate your closer look at which species may occur within smaller portions of your project site, you may use IPaC's functionality, without making the Official Species List request.
- Unless you are a Federal agency with an existing programmatic consultation with us, you can ignore any prompts to further your consultation in IPaC or to use D Keys.
- Once you have an established account in [Login.gov](https://login.gov), you may access IPaC directly at <https://ipac.ecosphere.fws.gov/> or continue to access IPaC via the home page at <https://ecos.fws.gov/ecp/>, accessing IPaC in the upper left hand corner.
- Additional background information about IPaC:

- Your official IPaC species list is based on species' range maps shown on each species' page in <https://ecos.fws.gov/ecp/>.
- Survey the project footprint and adjacent areas that may be affected by project-related increases in noise, lighting, invasive species, wildfire, and other stressors. Use the survey data to inform project design and your analysis of the effects of the action to the species.
- Address all the species in the Official Species List in your effects analysis.
- Incorporate the Service's recommended avoidance and minimization measures to the extent you can, and coordinate with our office for project-specific technical assistance when the avoidance measures can't be implemented.

Please do not hesitate to contact me or pifwo_admin@fws.gov for additional assistance.

Mahalo,
Chelsie



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai'i 96850

Subject: IPaC generated official species list for the Pacific Islands Fish and Wildlife Office

Dear Action Agency or Applicant:

The Pacific Islands Fish and Wildlife Office (PIFWO) is transitioning to the Information for Planning and Consultation (IPaC) online portal, <https://ipac.ecosphere.fws.gov/> for federal action agencies and non-federal agencies or individuals to obtain official species lists, including threatened and endangered species, designated critical habitat, and avoidance and minimization measures to consider in your general project design. IPaC has been used by continental USFWS offices to provide official species lists and avoidance and minimization guidance since 2017. Using IPaC expedites the process for species list distribution. Obtaining a species list in IPaC is relatively straightforward and takes minimal time to complete. Step by step instructions are included below.

Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of your species list should be verified after 90 days. New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change the species list. Verification can be completed by visiting the IPaC website at regular intervals during project planning and implementation. An updated list may be requested through the IPaC system by completing the same process used to obtain the initial species list.

We hope this process provides efficiencies to our partners in obtaining a species list. For federal action agencies, it also opens additional IPaC functionality that the PIFWO office is still working on, such as the use of Determination Keys for informal section 7 programmatic consultations. We will let our agency partners know when that functionality becomes available.

If you have questions about a species list obtained through the IPaC system or need assistance in completing an IPaC species list request, please contact the Service at 808-792-9400 or via email at pifwo_admin@fws.gov. We appreciate your efforts to conserve listed species across the Pacific Islands.

INTERIOR REGION 9
COLUMBIA-PACIFIC NORTHWEST

IDAHO, MONTANA*, OREGON*, WASHINGTON

*PARTIAL

INTERIOR REGION 12
PACIFIC ISLANDS


AMERICAN SĀMOA, GUAM, HAWAI'I, NORTHERN
MARIANA ISLANDS

Instructions for Action Agencies and partners to obtain an official species list in IPaC

- Navigate to <https://ipac.ecosphere.fws.gov/>
- You can get an unofficial species list without logging in. However, if you want an official species list you will need to log in first using your Login.gov account. If you don't have an IPaC account, they are easy to create.

Log in ×

LOGIN.GOV LOGIN
You can use your Login.gov profile as your IPaC account. You will need to allow IPaC to read your basic profile information.

LOG IN WITH  LOGIN.GOV

IPAC LOGIN
> [Why do I need an IPaC account?](#)

Select Log in with Login.gov and sign in using your email and password.

Email address

Password

Show password

Sign in

[Create an account](#)

[Sign in with your government employee ID](#)

If you have a PIV or CAC card, you can sign in using that method as well.

Sign in with your PIV or CAC

Make sure you have a [Login.gov](#) account and you've set up PIV/CAC as a two-factor authentication method.

[Insert your PIV/CAC](#)

[Cancel](#)

- Once you log in, select “Get Started”.

U.S. Fish & Wildlife Service
EMMA GOSLINER
IPaC Information for Planning and Consultation
Powered by ECOS - the Environmental Conservation Online System
Last login March 16, 2022 05:32 PM

IPaC is a project planning tool that streamlines the USFWS environmental review process

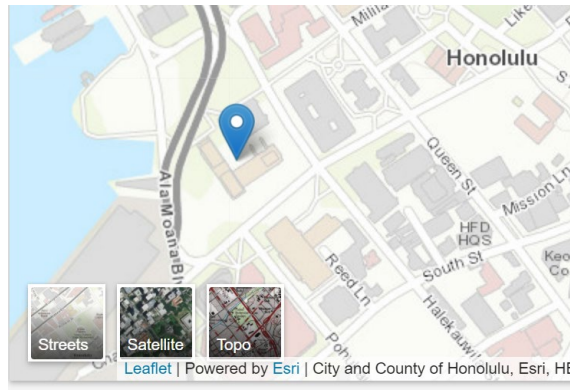
[GET STARTED](#) [MY PROJECTS](#)

- Define the action area: Identify the location of the proposed action by uploading an existing shapefile or by entering an address or coordinates of the action area. Once identified on the map, you can manually draw the action area using the drawing tools.

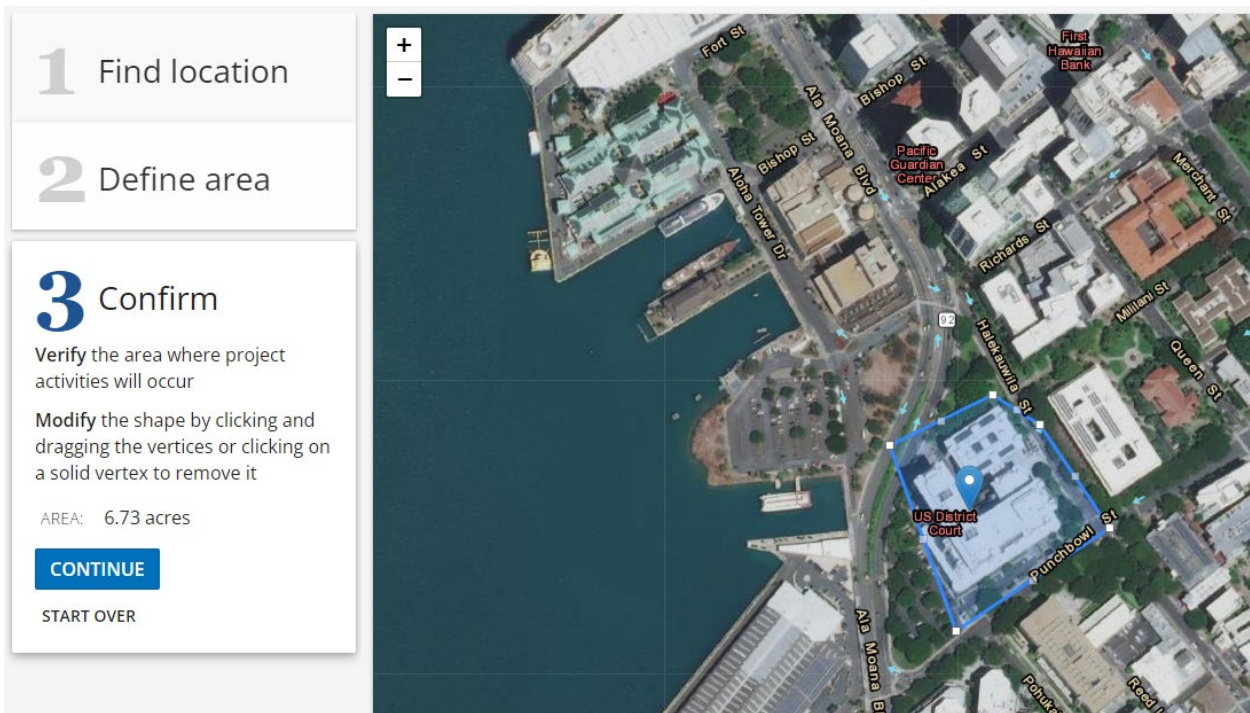
IPaC Information for Planning and Consultation
MY PROJECTS

1 Find location
Search or zoom to find the project location
Find a place
Or skip this step and:
UPLOAD SHAPE FILE
SELECT BY STATE OR COUNTY

2 Define area
Draw the area where activities will occur
Select a drawing tool
SKETCH
POLYGON
LINE
Other options:
UPLOAD SHAPE FILE
SELECT BY STATE OR COUNTY



To help identify your action area you can choose between multiple base maps available.



Press continue when you have finished drawing or uploading the action area location.

- The species information on the page that follows is not official. However, it identifies the project County, local Fish and Wildlife Field Office, species covered under NOAA Fisheries as well as Migratory Bird Treaty Act species. The list can be viewed in Thumbnail or List format.
- Once the species list populates you will see images of the species that may occur on, near, or transgress across your project. Click on SPECIES GUIDELINES on your top right to see Avoidance and Minimization measures to incorporate into your General Project Design Guidelines.

Explore location
 LOCAL OFFICE: PACIFIC ISLANDS FISH AND WILDL. OFC

LOCATION: Honolulu County, Hawaii
 CHANGE LOCATION

Resources

- ENDANGERED SPECIES 20
- MIGRATORY BIRDS 5
- FACILITIES
- WETLANDS !

PRINT RESOURCE LIST

What's next?
 Define a project at this location to evaluate potential impacts, get an official species list, and make species determinations.
 DEFINE PROJECT

Endangered species

Listed species (1) and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries (2)).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).


Additional information on endangered species data is provided [below](#).

The following species are potentially affected by activities in this location:

THUMBNAILS LIST SPECIES GUIDELINES

Mammals

Endangered



Hawaiian Hoary Bat
Lasiurus cinereus semotus
 Wherever found

- Continue with the following steps to comply with the requirements of ESA section 7 to obtain an **official species list**.
- Select Define Project

Define project

Define a project at this location to evaluate potential impacts, get an official species list, and make species determinations.

Project name

Project description
 Describe the location, size, scope, and timing of this project.

OPTIONAL

SAVE CANCEL


What's next?
 Define a project at this location to evaluate potential impacts, get an official species list, and make species determinations.
 DEFINE PROJECT

Enter the Project Name and a brief description of the project (a description is not mandatory, but recommended for future coordination with the Service). Click SAVE at bottom of page.

- At the bottom of the What's next box on the right, click Request Species List

Test Project

Testing



LOCATION Honolulu County, Hawaii

CREATED March 17, 2022

1 MEMBER 2 DOCUMENTS

What's next?

ESA REVIEW

Review this project's effects on listed species pursuant to the Endangered Species Act (ESA), as part of the overall regulatory review.

START REVIEW

SPECIES LIST

Requesting an official species list is now part of IPaC's ESA Review.

REQUEST SPECIES LIST

Local office

Pacific Islands Fish And Wildlife Office

- on the following screen, click Yes, Request Species List

Endangered Species Act Review

← BACK
EXIT REVIEW

1 Request an official species list
2 Evaluate determination keys
No Dkeys for project
3 Analyze project (optional)
4 Download documentation

Step 1: Request an official species list

An official species list is a letter from the local U.S. Fish and Wildlife Service field office that assists in the evaluation of potential impacts of your project. It includes a list of species that should be considered under [Section 7](#) of the Endangered Species Act, a project tracking number, and other pertinent information from the field office.

Does this project require an official species list?

Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action" ([Section 7](#) of the Endangered Species Act).

This requirement applies to projects that are **conducted, permitted, funded, or licensed** by any Federal agency.

YES, REQUEST A SPECIES LIST
SKIP / DOES NOT APPLY

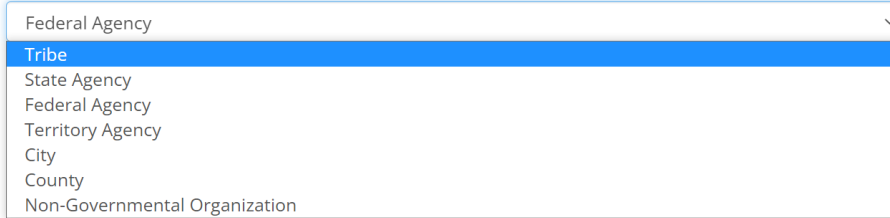
- Fill out the contact information for yourself or your agency. Contractors, state partners, and any other project proponents may request a species list and should be covered using the dropdown menus.

Tell us about the project and your organization or agency

Is this project being conducted, permitted, funded, or licensed by a Federal agency?

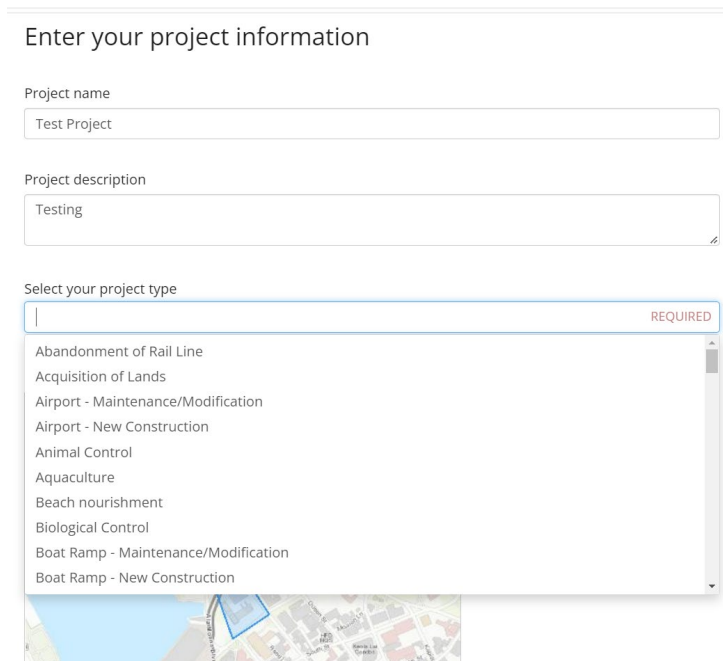
- Yes
 No

What kind of organization are you working for directly?



A pull-down menu with a white background and a blue border. The menu is open, showing a list of organization types. The top item is 'Federal Agency' with a small downward arrow. Below it, 'Tribe' is highlighted with a blue background. Other items include 'State Agency', 'Federal Agency', 'Territory Agency', 'City', 'County', and 'Non-Governmental Organization'.

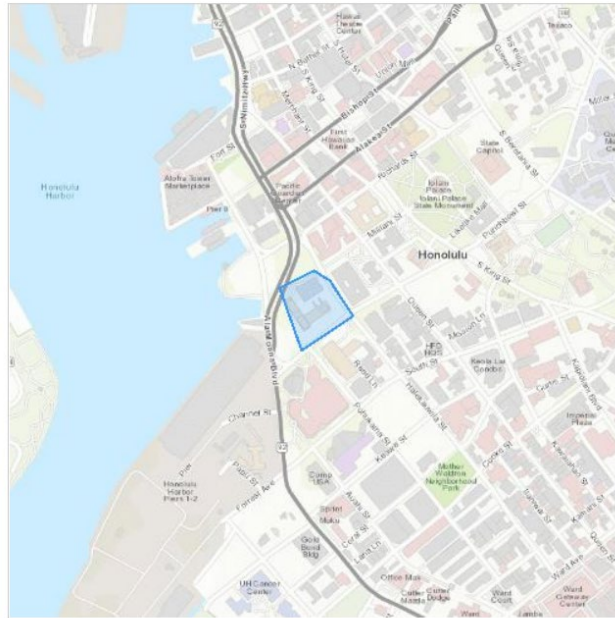
- From the pull-down menu for Classify Type of Project, select the project type that best fits the proposed action.



A form titled "Enter your project information" with a light gray border. It contains three main sections: "Project name" with a text input field containing "Test Project"; "Project description" with a text input field containing "Testing"; and "Select your project type" with a dropdown menu. The dropdown menu is open, showing a list of project types: "Abandonment of Rail Line", "Acquisition of Lands", "Airport - Maintenance/Modification", "Airport - New Construction", "Animal Control", "Aquaculture", "Beach nourishment", "Biological Control", "Boat Ramp - Maintenance/Modification", and "Boat Ramp - New Construction". The word "REQUIRED" is written in red in the top right corner of the dropdown menu. Below the dropdown menu, there is a small map showing a street grid with a blue rectangle highlighting a specific area.

- Once all required sections are filled out, press **SUBMIT OFFICIAL SPECIES LIST REQUEST**

Location



[SUBMIT OFFICIAL SPECIES LIST REQUEST](#)

- An Official Species List should be generated and available for download in a couple of seconds.
- If you need additional information on a species, click on their name that is hot-linked to their species information page. A brief overview of the species' status, description and critical habitat will appear as well as a link to their ECOS species profile.

Resources


- ENDANGERED SPECIES 20
- MIGRATORY BIRDS 5
- FACILITIES
- WETLANDS !

[PRINT RESOURCE LIST](#)

What's next?
Define a project at this location to evaluate potential impacts, get an official species list, and make species determinations.

[DEFINE PROJECT](#)

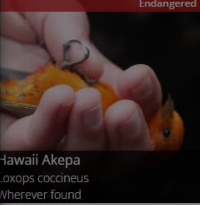
ʻiʻiwi
Drepanis coccinea



STATUS
Threatened: A species likely to become endangered within the foreseeable future throughout all or a significant portion of its range.

DESCRIPTION
The liwi is an Hawaiian forest bird in the endemic honeycreeper subfamily of the Fringillidae (finch family). Iwi are medium-sized forest birds (total body length is approximately 14 centimeters (cm) (5.5 inches (in)) with bright scarlet feathers, black wings and tail, and a small white patch on the inner secondary flight feathers. The bill is long, deeply

Endangered



Hawaii Akepa
Akema coccinea
Wherever found

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



KEITH A. REGAN
COMPTROLLER
KA LUNA HO'OMALU HANA LAULĀ

MEOH-LENG SILLIMAN
DEPUTY COMPTROLLER
KA HOPE LUNA HO'OMALU HANA LAULĀ

STATE OF HAWAII | KA MOKU'ĀINA O HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELawe LAULĀ
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

(P)24.204

1

SEP 10 2024

Ronald Sato, AICP
Bowers + Kubota Consulting, Inc.
2153 N. King Street, Suite 200
Honolulu, Hawaii 96819

Dear Ronald Sato:

Subject: Pre-Assessment Consultation for a NEPA Environmental Assessment
State Hawaii Public Housing Authority
Demolition of David Malo Circle and Piilani Homes
723 Mill St. and 1028 Waivee St., Lahaina, Hawaii 96761
T.M.K. # (2) 4-6-010:028 and (2) 4-5-007:005

Thank you for the opportunity to comment on the subject project. We have no comments to offer at this time as the proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities.

If you have any questions, your staff may call Dora Choy-Johnson of the Planning Branch at (808) 586-0488.

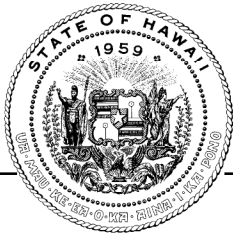
Sincerely,

A handwritten signature in black ink, appearing to read "Gordon S. Wood".

GORDON S. WOOD
Public Works Administrator

DC:mo

c: Jeff Pearson, DAGS MDO



STATE OF HAWAII
OFFICE OF PLANNING
& SUSTAINABLE DEVELOPMENT

JOSH GREEN, M.D.
GOVERNOR

SYLVIA LUKE
LT. GOVERNOR

MARY ALICE EVANS
DIRECTOR

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

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: <https://planning.hawaii.gov/>

DTS202409130907NA

Coastal Zone
Management
Program

September 27, 2024

Environmental Review
Program

Land Use Commission

Land Use Division

Special Plans Branch

State Transit-Oriented
Development

Statewide Geographic
Information System

Statewide
Sustainability Program

Mr. Ronald A. Sato, AICP
Senior Project Manager
Bowers + Kubota Consulting, Inc.
2153 North King Street, Suite 200
Honolulu, Hawai'i 96819-4554

Dear Mr. Sato:

Subject: Pre-Assessment Consultation for a NEPA Environmental Assessment, State Hawai'i Public Housing Authority Demolition of David Malo Circle and Pi'ilani Homes TMK: (2) 4-6-010:028 and (2) 4-5-007:005; 723 Mill Street & 1028 Waine'e Street, Lāhainā, Maui

We are in receipt of your early consultation request, dated September 6, 2024. This request is for the preparation of a National Environmental Policy Act (NEPA) and Hawai'i Revised Statutes (HRS) Chapter 343 compatible Environmental Assessment. The subject development involves two non-shoreline affordable housing projects located at 723 Mill Street (David Malo Circle) and 1028 Waine'e Street (Pi'ilani Homes).

The enclosed review material states that the Hawai'i Public Housing Authority (HPHA) seeks to demolish the remaining structures and debris removal from the David Malo Circle and Pi'ilani Homes housing projects, as part of recovery efforts following the Lāhainā Wildfires of August 8, 2023.

Restoration efforts will involve demolishing the remaining structures, removal of ash and debris, soil sampling, and the stabilization of the sites to reduce erosion. Work would also include the removal of destroyed vehicles, unusable utilities, and hazardous household materials based upon soil sampling and site assessments.

We acknowledge the restoring and revitalization of the historic area of Lāhainā is vital in the healing process, as well as re-establishing the economic vitality and health of Maui.

The Office of Planning and Sustainable Development (OPSD) has reviewed the submitted material and have the following comments to offer:

1. Hawai‘i Coastal Zone Management (CZM) Program

The CZM area is defined as “all lands of the State and the area extending seaward from the shoreline to the limit of the State’s police power and management authority, including the U.S. territorial sea” under HRS § 205A-1. Therefore, the entire State is considered within the Coastal Zone. Pursuant to HRS § 205A-4, in implementing the objectives of the CZM program, agencies shall consider ecological, cultural, historic, esthetic, recreational, scenic, open space values, coastal hazards, and economic development.

As this proposed development is proposed by a State agency, the Draft Environmental Assessment (Draft EA) should include an evaluation on how the proposed project conforms to the Hawai‘i CZM Program’s objectives and supporting policies, listed in HRS § 205A-2, as amended.

2. Stormwater Runoff, Erosion, and Water Resources

Pursuant to Hawai‘i Administrative Rules (HAR) § 11-200.1-18(d)(7) – identification and analysis of impacts and alternatives considered; to ensure that the nearshore marine resources of West Maui remain protected, the negative effects of stormwater runoff and sediment should be examined.

Issues that must be examined include, but are not limited to, land characteristics of the project site in relation to flood and erosion prone areas, as well the vulnerability of the nearshore environment to polluted stormwater runoff. Developing mitigation strategies to preserve surface water quality and limit impacts to the downslope coastal ecosystem from polluted runoff should be examined, pursuant to HAR § 11-200.1-18(d)(8).

In the creation of a stormwater runoff management plan, Low Impact Development (LID) strategies should be considered. LID best management practices (BMPs) are a proven method in protecting the coastal environment. HPHA, would benefit from reviewing our newly updated LID Practitioners Guide. The 2023 LID Practitioners Guide includes recommendations and guidance on the best LID BMPs options that may be employed. The 2023 LID Practitioners Guide can be accessed via our website at: https://files.hawaii.gov/dbedt/op/czm/ormp/ormp_implementation/2023LIDPractitionersGuide.pdf

3. Climate Change Adaptation/Sea Level Rise

As HAR 11-200.1-13(11) Significance Criteria require the Proposing Agency to consider and evaluate whether the proposed action would have a substantial adverse impact on, or suffer damage by being located in, an environmentally sensitive area or sea level rise (SLR) exposure area. The Draft EA should include an examination of whether the property could be vulnerable to SLR. We acknowledge that the subject parcels are not shoreline parcels and are inland of the Special Management Area of the island of Maui, however the intersecting

Mr. Ronald A. Sato, AICP
September 27, 2024
Page 3

roadways and nearby properties could be susceptible to coastal inundation. The Draft EA should evaluate the vulnerability of the project site as a whole to SLR threats. To assess the potential environmental impacts and vulnerability of the two project sites, we suggest the Draft EA refer to the findings of the Hawai'i Sea Level Rise Vulnerability and Adaptation Report 2017, accepted by the Hawai'i Climate Change Mitigation and Adaptation Commission.

The Report and the Hawai'i SLR Viewer at <https://www.pacioos.hawaii.edu/shoreline/slr-hawaii/> identifies a 3.2-foot SLR exposure area across the main Hawaiian Islands, as a starting evaluation point. The Draft EA should provide a map of at least 3.2-foot SLR exposure area in relation to the project area, evaluate potential SLR adaptation measures and safeguards when feasible.

If you have any questions or concerns, please contact Joshua Hekeia at (808) 587-2845 or by email to Joshua.K.Hekeia@hawaii.gov. If you wish to respond to this comment letter, please include DTS202409130907NA in the subject line.

Sincerely,

A handwritten signature in black ink that reads "Mary Alice Evans". The signature is written in a cursive, slightly slanted style.

Mary Alice Evans,
Director

RE: [External] HPHA Lahaina Demolition Project - NEPA Consultation

From Watase, Dean K <dean.k.watase@hawaii.gov>

Date Thu 10/10/2024 8:26 AM

To Ronald Sato <rsato@bowersandkubota.com>

Cc Minakami, Dean <dean.minakami@hawaii.gov>; Chu, Randy N.T. <randy.n.t.chu@hawaii.gov>; Woodard, Christopher <christopher.j.woodard@hawaii.gov>

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Morning, Ronald.

Thank you for the opportunity to provide comments on this project.

This project proposes to remove from the project site the remaining structures and debris that were damaged by the Maui wildfire. We have no comments.

Thank you.

Dean Watase
Housing Planning Manager
Hawaii Housing & Finance Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii 96813
Phone: 808 587-0639

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Ronald Sato

From: DOH.CABPDTSS <DOH.CABPDTSS@doh.hawaii.gov>
Sent: Friday, September 13, 2024 2:41 PM
To: Ronald Sato
Subject: [External] DOH-CAB Response to Pre-Assessment Consultation for a DEA on a David Malo Circle and Piilani Homes Demolition

Follow Up Flag: Flag for follow up
Flag Status: Flagged

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Thank you for your notice regarding Pre-Assessment Consultation for a NEPA-DEA for the Demolition of David Malo Circle and Piilani Homes Projects. We have updated our system and our policy.

Please find CAB website including our standard comments for Land Use Reviews below:
<https://health.hawaii.gov/cab/clean-air-branch/standard-comments-for-land-use-reviews/>

Thank you so much for your understanding.

Anna Gardner
Program Specialist | Clean Air Branch
Hawai'i State Department of Health | Ka 'Oihana Olakino
2827 Waimano Home Road #130 | Pearl City, HI 96782
Office: (808) 586-4200

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This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.

Standard Comments for Land Use Reviews
Clean Air Branch
Hawaii State Department of Health
July 3, 2024

All project activities shall comply with Hawaii Administrative Rules (HAR), Chapter 11-59 and 11-60.1.

If your proposed project:

Requires an Air Pollution Control Permit

- You must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch.
- Permit application forms can be found here: <https://health.hawaii.gov/cab/permit-application-forms/>

Has the potential to generate fugitive dust

- You must reasonably control the generation of all airborne, visible fugitive dust. Note that construction activities that occur near existing residences, businesses, public areas and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies and mitigates all activities that may generate airborne, visible fugitive dust. The plan, which does *not* require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems.
- Construction activities must comply with the provisions of Hawaii Administrative Rules, §11- 60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, it is strongly recommended that buffer zones be established, wherever possible, in order to alleviate potential dust concerns.
- You must provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:
 - Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
 - Providing an adequate water source at the site prior to start-up of construction activities;
 - Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
 - Minimizing airborne, visible fugitive dust from shoulders and access roads;
 - Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
 - Controlling airborne, visible fugitive dust from debris being hauled away from the project site.
- If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch. Please also see fugitive dust fact sheet at: <https://health.hawaii.gov/cab/files/2024/02/Hawaii-Fugitive-Dust-Fact-Sheet-February-2024.pdf>.

Includes construction, demolition, or renovation activities that involve potential asbestos and lead containing materials

- Please contact the Indoor and Radiological Health Branch at (808) 586-4700 or visit: <https://health.hawaii.gov/irhb/>

Increases the population and potential number of vehicles in an area

- The creation of apartment buildings, complexes, and residential communities may increase the overall population in an area. Increasing the population in an area may inadvertently lead to more air pollution via vehicle exhaust. Vehicle exhaust releases pollutants in the air that can negatively impact human health and air quality, including lung irritants, carcinogens, and greenhouse gases.
- Ensure that drivers keep vehicle idling times to three (3) minutes or less.
- Consider and incorporate support for alternative transportation options such as bike racks and/or electric vehicle charging stations where possible.

If you have any questions, please contact the Clean Air Branch at (808) 586-4200 or at cab@doh.hawaii.gov.

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

October 8, 2024

Bowers & Kubota Consulting, Inc.
Attn: Mr. Ronald A. Sato, AICP
2153 N King Street, Suite 200
Honolulu, Hawaii 96819

via email: rsato@bowersandkubota.com

Dear Mr. Sato:

SUBJECT: Pre-Assessment Consultation for a NEPA Environmental Assessment for the Demolition of **David Malo Circle and Pi'ilani Homes Housing Projects** located at 723 Mill Street, Lahaina; TMK: (2) 4-6-010:028 (David Malo Circle) and 1028 Waive'e Street, Lahaina; TMK: (2) 4-5-007:005 (Pi'ilani Homes) on behalf of Hawaii Public Housing Authority

Thank you for the opportunity to review and comment on the subject matter. The Land Division of the Department of Land and Natural Resources (DLNR) distributed or made available a copy of your request pertaining to the subject matter to DLNR's Divisions for their review and comments.

At this time, enclosed are comments from the Division of Boating & Ocean Recreation on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

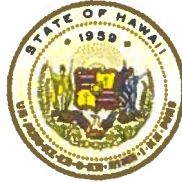
Russell Tsuji

Russell Y. Tsuji
Land Administrator

Enclosure
cc: Central Files

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

September 6, 2024

MEMORANDUM

RECEIVED
LAND DIVISION
2024 SEP 10 PM 2:20
DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

TO: **DLNR Agencies:**
 Div. of Aquatic Resources (kendall.i.tucker@hawaii.gov)
 Div. of Boating & Ocean Recreation (richard.t.howard@hawaii.gov)
 Engineering Division (DLNR.ENGR@hawaii.gov)
 Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
 Div. of State Parks (curt.a.cottrell@hawaii.gov)
 Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
 Office of Conservation & Coastal Lands (sharleen.k.kuba@hawaii.gov)
 Land Division – Maui District (dlnr.land.maui@hawaii.gov)
 Aha Moku Advisory Committee (leimana.k.damate@hawaii.gov)

FROM: Russell Y. Tsuji, Land Administrator
SUBJECT: Pre-Assessment Consultation for a NEPA Environmental Assessment for the Demolition of **David Malo Circle and Pi'ilani Homes Housing Projects**
LOCATION: 723 Mill Street, Lahaina; TMK: (2) 4-6-010:028 (David Malo Circle)
1028 Waine'e Street, Lahaina; TMK: (2) 4-5-007:005 (Pi'ilani Homes)
APPLICANT: Bowers & Kubota on behalf of Hawaii Public Housing Authority

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit any comments by **October 4, 2024**.

If no response is received by the above date, we will assume your agency has no comments. Should you have any questions about this request, please contact Darlene Nakamura at darlene.k.nakamura@hawaii.gov. Thank you.

BRIEF COMMENTS:

- We have no objections.
- We have no comments.
- We have no additional comments.
- Comments are included/attached.

Signed:
Print Name: Richard Howard
Division: DGBOR
Date: 9/10/2024

Attachments
cc: Central File

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

October 9, 2024

Bowers & Kubota Consulting, Inc.
Attn: Mr. Ronald A. Sato, AICP
2153 N King Street, Suite 200
Honolulu, Hawaii 96819

via email: rsato@bowersandkubota.com

Dear Mr. Sato:

SUBJECT: Pre-Assessment Consultation for a NEPA Environmental Assessment for the Demolition of **David Malo Circle and Pi'ilani Homes Housing Projects** located at 723 Mill Street, Lahaina; TMK: (2) 4-6-010:028 (David Malo Circle) and 1028 Waive'e Street, Lahaina; TMK: (2) 4-5-007:005 (Pi'ilani Homes) on behalf of Hawaii Public Housing Authority

Thank you for the opportunity to review and comment on the subject matter. In addition to our previous comments dated October 8, 2024, enclosed are comments from the Engineering Division on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

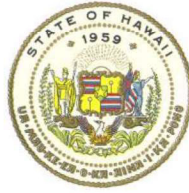
Russell Tsuji

Russell Y. Tsuji
Land Administrator

Enclosure
cc: Central Files

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

September 6, 2024

MEMORANDUM

FROM: ~~TO:~~

DLNR Agencies:

- Div. of Aquatic Resources (kendall.l.tucker@hawaii.gov)
- Div. of Boating & Ocean Recreation (richard.t.howard@hawaii.gov)
- Engineering Division (DLNR.ENGR@hawaii.gov)
- Div. of Forestry & Wildlife (rbyrosa.t.terrago@hawaii.gov)
- Div. of State Parks (curt.a.cottrell@hawaii.gov)
- Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
- Office of Conservation & Coastal Lands (sharleen.k.kuba@hawaii.gov)
- Land Division – Maui District (dlnr.land.maui@hawaii.gov)
- Aha Moku Advisory Committee (leimana.k.damate@hawaii.gov)

Russell Tsuji

TO: FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Pre-Assessment Consultation for a NEPA Environmental Assessment for the Demolition of **David Malo Circle and Pi'ilani Homes Housing Projects**

LOCATION: 723 Mill Street, Lahaina; TMK: (2) 4-6-010:028 (David Malo Circle)
1028 Waine'e Street, Lahaina; TMK: (2) 4-5-007:005 (Pi'ilani Homes)


APPLICANT: Bowers & Kubota on behalf of Hawaii Public Housing Authority

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit any comments by **October 4, 2024**.

If no response is received by the above date, we will assume your agency has no comments. Should you have any questions about this request, please contact Darlene Nakamura at darlene.k.nakamura@hawaii.gov. Thank you.

BRIEF COMMENTS:

- () We have no objections.
- () We have no comments.
- () We have no additional comments.
- () Comments are included/attached.

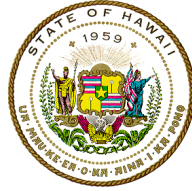
Signed: 

Print Name: Carty S. Chang, Chief Engineer

Division: Engineering Division

Date: Oct 8, 2024

Attachments
cc: Central File



The Senate
Ka 'Aha Kenekoa

STATE CAPITOL
HONOLULU, HAWAII 96813

September 25, 2024

VIA: ELECTRONIC MAIL

Mr. Ronald A. Sato, AICP
Bowers + Kubota Consulting, Inc.
2153 North King Street, Suite 200
Honolulu, HI 96819-4554
Email: rsato@bowersandkubota.com

**RE: COMMENTS ON PRE-ASSESSMENT FOR NEPA ENVIRONMENTAL
ASSESSMENT – DEMOLITION OF DAVID MALO CIRCLE AND PI'ILANI HOMES**

Dear Mr. Sato:

Thank you for sharing the pre-assessment consultation for the Environmental Assessment regarding the proposed demolition of David Malo Circle and Pi'ilani Homes in Lāhainā. As the representative of this region, I fully support the removal of debris and the necessary clearance to allow for the potential rebuilding of our community, following the devastation caused by the Lāhainā Wildfires. The removal of hazardous material is not only essential for the safety of our residents but also a critical first step in the recovery process.

However, I am compelled to express my concerns about the timing of this effort. It is now over a year since the fires destroyed these homes, and the question that many in the community are asking is: why has this debris removal been so delayed? Given the urgency and gravity of the situation, I strongly urge that these efforts be expedited. The residents of Lāhainā have already waited far too long for meaningful action, and it is essential that this work is completed without further delay.

Additionally, while debris removal is a necessary first step, I have serious concerns regarding the lack of a clear and definitive plan to replace the housing units lost. The pre-assessment letter states that there are currently no redevelopment plans in place to rebuild the 60 low-income units that were destroyed. This is deeply troubling, as the housing crisis in Lāhainā has only worsened in the wake of the wildfires. I request clarification on the intended next steps after the demolition. Specifically, what is the plan to restore the lost housing in Lāhainā? The

Senator Angus L. K. McKelvey
Senate District 6 – West Maui, Mā'alaea, Waikapū, South Maui
415 South Beretania St., Room 223
Honolulu, Hawaii • 96813
Phone: (808) 586-6070 • Email: senmckelvey@capitol.hawaii.gov

Ronald A. Sato
September 25, 2024
Page 2 of 2

people of our community need assurances that they will not be left without affordable housing options.

I appreciate your efforts and look forward to your response regarding these concerns. It is crucial that this process be carried out with both urgency and transparency so that the residents of Lāhainā can finally begin to see progress in the rebuilding of their homes and lives.

Sincerely,

A handwritten signature in black ink, appearing to read 'AMK', is written over a horizontal line.

Angus L.K. McKelvey
Hawaii State Senator

RICHARD T. BISSEN, JR.
Mayor

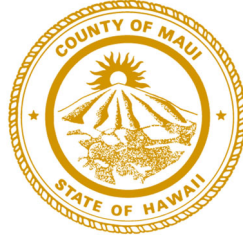
SHAYNE R. AGAWA, P.E.
Director

ROBERT SCHMIDT
Deputy Director

MICHAEL KEHANO, P.E.
Solid Waste Division

ERIC A. NAKAGAWA, P.E.
Wastewater Reclamation Division

Environmental Protection &
Sustainability Division



COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

2145 KAOHU STREET, SUITE 102
WAILUKU, MAUI, HAWAII 96793

October 1, 2024

Mr. Ronald A. Sato, AICP
Bowers + Kubota Consulting, Inc.
2153 North King Street, Suite 200
Honolulu, Hawai'i 96819-4554
Email: rsato@bowersandkubota.com

**SUBJECT: PRE-ASSESSMENT CONSULTATION FOR A NEPA ENVIRONMENTAL ASSESSMENT
STATE HAWAII' I PUBLIC HOUSING AUTHORITY
DEMOLITION OF DAVID MALO CIRCLE AND PI'ILANI HOMES (ISLAND OF MAUI)
TAX MAP KEYS: (2) 4-6-010:028 AND (2) 4-5-007:005
723 MILL ST. AND 1028 WAINE'E ST., LAHAINA, HAWAII, 96761**

Dear Mr. Sato,

The County of Maui, Department of Environmental Management, Solid Waste Division (SWD), acknowledges receipt of your letter, dated September 6, 2024, requesting comments on the subject project. Please note that our review is based solely on the information provided in the subject document and as it relates to solid waste. The State of Hawai'i Public Housing Authority (HPHA) may be responsible for fulfilling additional requirements related to other Department of Environmental Management rules or requirements. We understand that some of the cleanup work may have already been completed as part of the Federal Emergency Management Agency's (FEMA) public assistance program and taken to the temporary site in Olowalu. Any remaining demolition or future construction material for the subject property that will be taken to a County of Maui landfill will need to adhere to the County's disposal requirements. The SWD offers the following comments:

1. For all projects, demolition, new construction, remodel projects etc., customers are requested to divert all re-usable materials throughout the project, maximizing efficiency and resource allocation to lessen the burden on the County of Maui landfill and resources. For additional information regarding recycling options contact the County of Maui Environmental Protection and Sustainability Division.
2. If construction and/or demolition (C&D) is expected to be disposed of at a County landfill during a project, a C&D application must be submitted and approved prior to delivery to the local landfill. Please see the SWD website link: <https://www.mauicounty.gov/1739/Commercial-ConstructionDemo-Waste-Accept> for details. In addition to a C&D Number, commercial customers must also have a valid landfill Disposal Permit/Account. The Solid Waste Division

(SWD) should be immediately notified if there is any significant revisions or changes to the permitted C&D waste hauling.

3. Hazardous wastes are not accepted at County landfills. However, special wastes such as asbestos, contaminated soil, and canec may be permitted upon request. Contact the landfill to inquire and/or make arrangements for special wastes.
4. Check the latest County of Maui Rates and Fees schedule for tipping fees.

Should you have any questions, please call Sage Kiyonaga, Civil Engineer VI, at (808) 270-7941.

Sincerely,

for SHAYNE R. AGAWA, P.E.
Director of Environmental Management

RICHARD T. BISSEN, JR.
Mayor

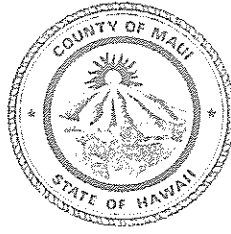
SHAYNE R. AGAWA, P.E.
Director

ROBERT SCHMIDT
Deputy Director

MICHAEL KEHANO, P.E.
Solid Waste Division

ERIC A. NAKAGAWA, P.E.
Wastewater Reclamation Division

Environmental Protection &
Sustainability Division



**COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT**
2145 KAOHU STREET, SUITE 102
WAILUKU, MAUI, HAWAII 96793

September 9, 2024

Mr. Ronald A. Sato, AICP
Bowers + Kubota Consulting, Inc.
2153 North King Street, Suite 200
Honolulu, HI 96819-4554

email: rsato@bowersandkubota.com

WWMR2024-00140

Dear Mr. Sato

**SUBJECT: PRE-ASSESSMENT CONSULTATION
(NEPA ENVIRONMENTAL ASSESSMENT)
STATE HAWAII PUBLIC HOUSING AUTHORITY
DEMOLITION of DAVID MALO CIRCLE (723 MILL ST.)
DEMOLITION of PI'ILANI HOMES (1028 WAINE'E ST.)
LĀHAINĀ, HAWAII, 96761
TMK's (2) 4-6-010:028 and (2) 4-5-007:005**

We are in receipt of your September 6, 2024 request for comments regarding the subject two projects in the Lahaina Fire Recovery Area. A review of our wastewater systems in the vicinity of the projects note the following.

Demolition/Cleanup:

1. The County does not have any sewer lines with in your properties. Lines within the two sites are privately owned and maintained.
2. The existing private sewer lines on the property were potentially damaged by the fire and are likely to have contaminated water, debris and/or ash within them that should not be flushed into the County system. These lines should be cleaned and assessed by your plumber/contractor to determine if they are structurally sound or should be replaced.
3. Redevelopment of the property will require the installation of a property sewer service manhole if one does not currently exist. You could consider installing one to help clean and assess your existing system.

Redevelopment:

4. The County sewer lines serving the Wainee project are not currently active. We anticipate completing repairs and activating the lines by the end of 2025. Lines serving the Mill Street property are currently active.
5. There is sufficient capacity at the Lahaina Wastewater Reclamation Facility (WWRF) to accommodate these projects if rebuilt as they were originally constructed. Adding additional units is possible but will need to be evaluated once the projects are defined.

6. These projects will impact the sewer collection system. At this time no improvements would be necessary, however, depending on the actual construction time frame and potential other future projects, upgrades on downstream trunk lines could be necessary in the Lahaina Cannery Mall area (approx. 950 l.f. of 27" upgraded to 30")
7. While we do not currently anticipate any issues at this time, changes in our operating permits could have the potential of limiting additional wastewater flows at the Lahaina WWRF.
8. Note that wastewater capacity is not guaranteed until building permits are issued.

Should you have any further questions or require additional information please contact our division at (808) 270-7417.

Sincerely,



Digitally signed by Eric
Nakagawa
Date: 2024.09.09 11:12:13
-10'00'

Eric A. Nakagawa, P.E.
Wastewater Reclamation Division Chief

Re: [External] HPHA Lahaina Demolition Prohect

From Tazminey K. Cremer-Kaalakea <Tazminey.Cremer-Kaalakea@mpd.net>

Date Wed 9/18/2024 1:15 PM

To Ty Shiramizu <tshiramizu@bowersandkubota.com>

Cc William T. Cleghorn II <William.CleghornII@mpd.net>

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Aloha,

After careful review of the preassessment consultation package, at this time, there are no matters of concern on a police standpoint.

Mahalo,

Tazminey K Cremer-Kaalakea

Community Police Officer

Lahaina District

1850 Honoapiilani Hwy, Lahaina, HI 96761

Cell: (808)463-0536

Email: tazminey.cremer-kaalakaa@mpd.net

From: Ty Shiramizu <tshiramizu@bowersandkubota.com>

Sent: Tuesday, September 10, 2024 8:23:21 PM

To: Tazminey K. Cremer-Kaalakea <Tazminey.Cremer-Kaalakea@mpd.net>

Cc: William T. Cleghorn II <William.CleghornII@mpd.net>

Subject: RE: HPHA Lahaina Demolition Prohect

Aloha Officer Cremer-Kaalakea,

Please find the Preassessment Consultation package for the Maui Police Department attached. Thank you for your interest in the project, we look forward to your correspondence.

Mahalo,

Ty Shiramizu, AICP

Bowers + Kubota

HawaiiBusiness' 2024 Best Places to Work

Main Office: (808) 521-5361

Fax: (808) 538-7819

www.bowersandkubota.com

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From: Tazminey K. Cremer-Kaalakea <Tazminey.Cremer-Kaalakea@mpd.net>

Sent: Tuesday, September 10, 2024 1:10 PM

To: Ty Shiramizu <tshiramizu@bowersandkubota.com>

Cc: William T. Cleghorn II <William.CleghornII@mpd.net>

Subject: [External] HPHA Lahaina Demolition Prohect

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Aloha,

I received the assignment for the Lahaina demolition project proposed; however, it seems that the attachments of the letter and enclosures was lost in the chains passed down. By chance, could I get them again.

Mahalo,

Tazminey K. Cremer-Kaalakea

Community Police Officer

Lahaina District

1850 Honoapiilani Hwy, Lahaina, HI 96761

Cell: (808)463-0536

Email: tazminey.cremer-kaalakea@mpd.net

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Council Chair
Alice L. Lee

Vice-Chair
Yuki Lei K. Sugimura

Presiding Officer Pro Tempore
Tasha Kama

Councilmembers
Tom Cook
Gabe Johnson
Tamara Paltin
Keani N.W. Rawlins-Fernandez
Shane M. Sinenci
Nohelani U'u-Hodgins



Director of Council Services
David M. Raatz, Jr., Esq.

Deputy Director of Council Services
Richelle K. Kawasaki, Esq.

COUNTY COUNCIL

COUNTY OF MAUI
200 S. HIGH STREET
WAILUKU, MAUI, HAWAII 96793
www.MauiCounty.us

September 30, 2024

Mr. Ronald A. Sato, AICP
Bowers + Kubota Consulting, Inc.
2153 North King Street, Suite 200
Honolulu, HI 96819-4554
via email: rsato@bowersandkubota.com

Dear Mr. Sato,

**SUBJECT: PRE-ASSESSMENT CONSULTATION FOR A NEPA ENVIRONMENTAL ASSESSMENT DEMOLITION OF DAVID MALO CIRCLE AND PIILANI HOMES
723 MILL STREET AND 1028 WAINEE STREET, LAHAINA
TMKS: 4-6-010:028 AND 4-5-007:005**

Thank you for your September 9, 2024 letter asking for early consultation on the above-referenced Environmental Assessment.

I have no objections to the proposed project that would demolish and remove all inhabitable structures, hazardous materials and related debris from the David Malo Circle and Piilani Homes housing developments. The August 2023 wildfires destroyed roughly 2,000 homes when Maui was already facing a housing shortage; the loss of these homes, including the 60 low-income residences at David Malo Circle and Piilani Homes, has been devastating.

Your letter noted that the project is needed to begin recovery efforts to allow for the redevelopment of these sites to replace these 60 units. However, it also notes that there are no redevelopment plans at this time and that the Hawaii Public Housing Authority (HPHA) will evaluate its options in this regard. While I support the demolition and debris removal project, I strongly urge the HPHA to immediately begin working with the community on redevelopment plans for these sites to bring back low-income housing to Lahaina as soon as possible.

Honorable Josh Green, Governor
September 30, 2024
Page 2

HPHA is likely aware of the community meetings that have been conducted by the County to help the long-term recovery plan for Lahaina. I encourage them to familiarize themselves with this effort so that plans for these two sites can be pursued swiftly and with community support.

Again, thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Alice L. Lee". The signature is fluid and cursive, with the first name "Alice" being the most prominent.

ALICE L. LEE
Council Chair

chr:ltr:240924aBowersKubotaNEPA

RE: [External] HPHA Lahaina Demolition Project - NEPA Preassessment Consultation

From Liu, Rouen <rouen.liu@hawaiianelectric.com>

Date Thu 9/19/2024 1:08 PM

To Ronald Sato <rsato@bowersandkubota.com>

Cc Ty Shiramizu <tshiramizu@bowersandkubota.com>; McNeff, Mathew <mathew.mcneff@hawaiianelectric.com>

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Dear Mr. Sato,

Thank you for the opportunity to comment on the subject project. Hawaiian Electric Company has no objection to the project. Should Hawaiian Electric have existing easements and facilities on the subject property, we will need continued access for maintenance of our facilities. We appreciate your efforts to keep us apprised of the subject project in the planning process. As the proposed HPHA project comes to fruition, please continue to keep us informed.

Please contact me at 808-772-2135 should there be any questions.

Rouen Liu (WA3 – PTA)
Permits Engineer
Hawaiian Electric Company
PO Box 2750
Honolulu Hawaii 96840-0001

From: Ty Shiramizu <tshiramizu@bowersandkubota.com>

Sent: Friday, September 6, 2024 1:35 PM

To: Liu, Rouen <rouen.liu@hawaiianelectric.com>

Cc: Ronald Sato <rsato@bowersandkubota.com>

Subject: HPHA Lahaina Demolition Project - NEPA Preassessment Consultation

[This email is coming from an EXTERNAL source. Please use caution when opening attachments or links in suspicious email.]

Aloha Mr. Liu,

The State of Hawai'i, Hawai'i Public Housing Authority (HPHA) is preparing a federal Environmental Assessment (EA) under the National Environmental Policy Act for the proposed demolition of two public housing projects which are located in Lāhainā, Maui: David Malo Circle and Pi'ilani Homes. The proposed demolition would clear remaining structures and debris from both sites as part of recovery efforts following the wildfires that impacted the town of Lāhainā in August 2023.

Attached is a letter and enclosures provided for the purpose of gathering early agency and stakeholder input for the subject project, or to identify information that the Draft Environmental Assessment (DEA)

should address. Could you please review the enclosures and submit your written comments within 30 days of receipt of this letter.

Mahalo,

Ty Shiramizu, AICP

Bowers + Kubota

HawaiiBusiness' 2024 Best Places to Work

Main Office: (808) 521-5361

Fax: (808) 538-7819

www.bowersandkubota.com

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David Malo Circle and Pi'ilani Home site

From Neal Kadooka <nkadooka@hawaiigas.com>

Date Mon 9/16/2024 8:21 AM

To Ronald Sato <rsato@bowersandkubota.com>

 2 attachments (1 MB)

Scanned from Hawaii Gas Mailroom Xerox Multifunction Printer.pdf; Lahaina Utility Map.pdf;

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Aloha Ronald.

Thank you for contacting Hawaii Gas requesting input and comments. I have attached our utility maps that shows where our LPG Gas utility lines are located.

David Malo Circle: 723 Mill Street (TMK) (2) 4-6-010:028. Our gas utility lines did not reach this property.

Pi'ilani Homes: 1028 Waine'e Street (TMK) (2) 4-5-007:005. Our gas utility lines ran through the parking lot at the North end of the property. Indicated by green (see Lahaina Utility Line.png) There is a 4" XTC gas main that is not functional.

Additional information: 1) Currently the entire Hawaii Gas gas utility system is not functional and deenergized (green lines)

2) 811 inquiries to Hawaii Gas prior to any excavation required as per standard requirement.

Please let me know if you have any additional information you require.

Neal Kadooka - Business Development Specialist

74-5564 Kaiwi St. Kailua-Kona, Hawaii

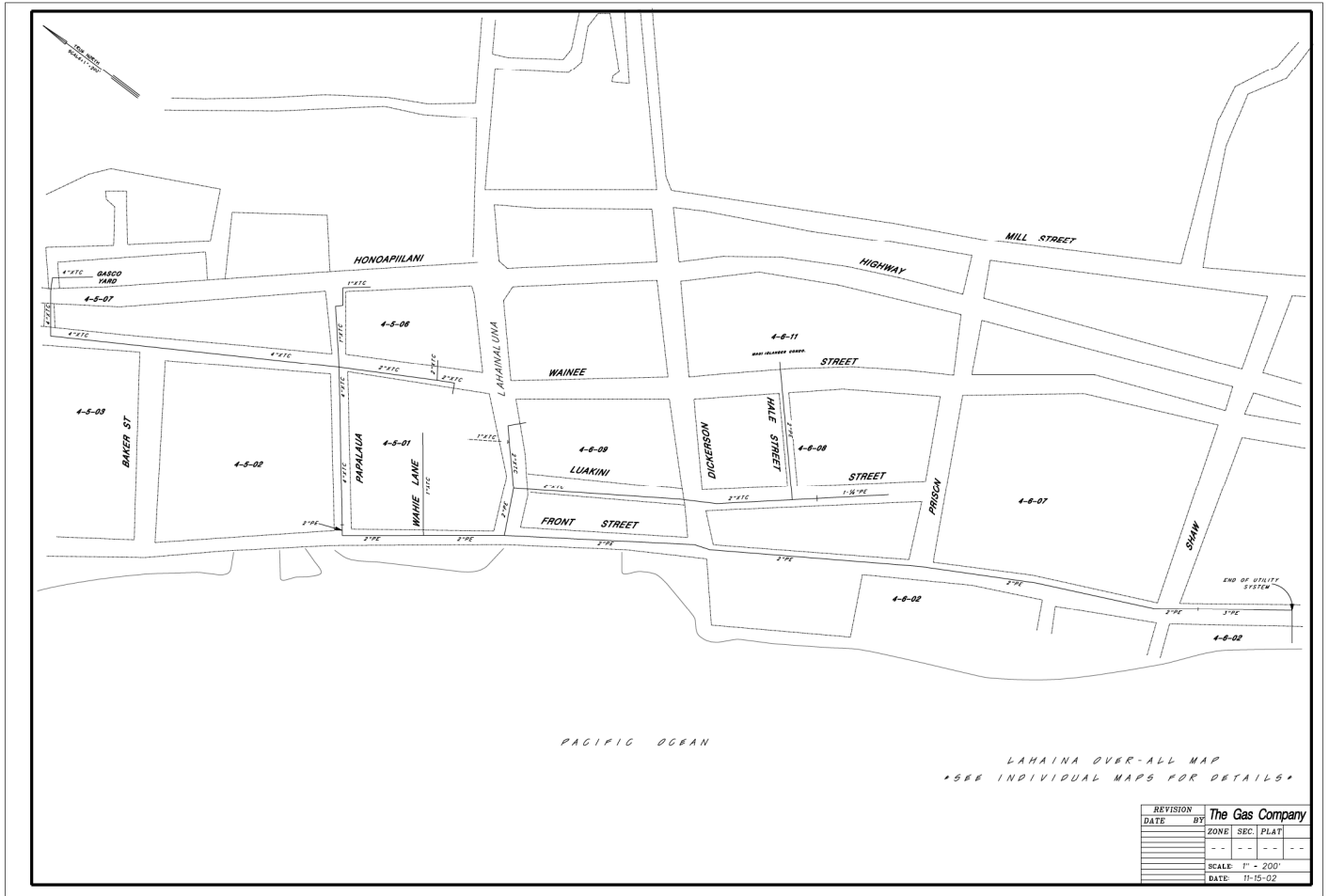
Cell: 808-640-1379

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March 2023







PACIFIC OCEAN

LAHAINA OVER-ALL MAP
 SEE INDIVIDUAL MAPS FOR DETAILS

REVISION				BY The Gas Company			
DATE	ZONE	SEC	PLAT	DATE	ZONE	SEC	PLAT
SCALE: 1" = 200'				DATE: 11-15-02			

Map prepared under San Sec. 14, 2003 802938



APPENDIX B
Site Photos



Photo 1 (facing southwest): View of northwestern boundary of David Malo Circle from Mill Street.



Photo 2 (facing southeast): View of Mill Street and access roads at northeastern boundary of David Malo Circle.



Photo 3 (facing northwest): View of northwestern boundary from middle of David Malo Circle.



Photo 4 (facing northeast): View from southwestern edge of David Malo Circle.



Photo 5 (facing southwest): View of remaining utility structures at northwestern end of David Malo Circle.



Photo 6 (facing west): View of remaining utility structures at center of David Malo Circle.

SITE PHOTOS: DAVID MALO CIRCLE



Photo 7 (facing southeast): View of Wainee Street and access to parking lot at northwestern end of Piilani Homes.



Photo 8 (facing southeast): View of Piilani Homes from parking lot.



Photo 9 (facing east): View of walkway and remnant Building A.



Photo 10 (facing east): View of walkway leading to destroyed Building B near northeastern boundary.



Photo 11 (facing south): View of remnant Building E at south end of Piilani Homes



Photo 12 (facing south): View of walkway and frontage of remnant Building B.



APPENDIX C

Preliminary Assessment of Environmental Hazards

David Malo and Piilani Housing Developments

December 2024

Prepared by: Element Environmental, LLC.



element environmental llc
environmental · engineering · water resources

December 18, 2024

Mr. Ronald Sato, AICP
Bowers + Kubota
94-408 Akoki St., STE 201-A
Waipahu, HI 96797
Main Office: (808) 836-7787 / (808) 833-1841
Fax: (808) 834-4833
email: rsato@bowersandkubota.com

Subject: **Preliminary Assessment of Environmental Hazards**
David Malo and Piilani Housing Developments
Lahaina, Maui, Hawaii

Dear Mr. Sato:

Element Environmental, LLC (E2) is pleased to submit this Final Site Visit Summary Report for a preliminary assessment of environmental hazards, specifically regarding the burned building sites at the David Malo and Piilani Housing Developments located in Lahaina, Maui, Hawaii. The David Malo development is located at 723 Mill Street, Tax Map Key (TMK): 460100280000. The Piilani Development is located at 1028 Wainee Street, TMK: 450070050000. The site visit was conducted on September 10, 2024.

A Summary Report is provided as Attachment A.

Should you have any questions, please call me on my mobile phone at (808) 479-6075

Sincerely,

Matthew Neal
Senior Environmental Scientist
Senior Vice President
Element Environmental, LLC

Attachments



ATTACHMENT A

SUMMARY REPORT Element Environmental, LLC

Project: Preliminary Assessment of Environmental Hazards
David Malo and Piilani Housing Developments
Lahaina, Maui, Hawaii

Client: Bowers + Kubota

Date: December 18, 2024

PROJECT UNDERSTANDING

Element Environmental, LLC (E2) was retained by Bowers + Kubota to conduct a preliminary environmental assessment during an single site visit of two State of Hawaii Public Housing Authority (HPHA) housing developments located in Lahaina, Maui (David Malo and Piilani Homes) that were damaged or destroyed by the August 8, 2023 Lahaina wildfires. E2 understands that an assessment and recommendations to address the potential presence of hazardous materials during demolition and removal of hazardous waste or potential hazardous waste (e.g., asbestos, lead paint, canec, mercury-containing lamps, polychlorinated biphenyl-containing ballasts and electrical equipment), accumulated ash, and contaminated soil (e.g., lead, arsenic, organochlorine pesticides, etc.) prior to demolition and in accordance with current federal, state, and local requirements.

The scope of work (SOW) is included in the E2 proposal dated April 30, 2024 and is based on email and telephone conversations with Bowers + Kubota.

The sites are located at:

1. David Malo Housing Development, 723 Mill Street, Tax Map Key (TMK): 460100280000
2. Piilani Housing Development, 1028 Wainee Street, TMK: 450070050000



SITE VISIT

Matthew Neal of E2 attended a site visit to both properties on September 10, 2024. Other attendees at the site visit included:

- Vanessa A Medeiros, Property Management & Maintenance Services Branch, Hawaii Public Housing Authority
- Ronald Sato, AICP, Bowers + Kubota
- Ty Shiramizu, Bowers + Kubota
- Annalise Shiraki, MASON, Architectural Historian

The site visit began at the David Malo project at 10:30 am and concluded at the Piilani project at around 11:30 am. The site visit consisted of a visual inspection of the properties, no sampling was conducted and personnel did not enter the buildings.

OBSERVATIONS

Both properties (David Malo and Piilani) participated in both phases of the fire cleanup process that was administered by the County of Maui in partnership and coordination with the United States Environmental Protection Agency (USEPA), the United States Corps of Engineers (USACE), the Federal Emergency Management Agency (FEMA) and their contractors. The cleanup process for residential properties that were affected by the Lahaina fire included two primary phases:

1. Hazardous material inspection and removal, completed by the USEPA; and
2. Fire debris removal operations, completed by the USACE

Once the USEPA completed the hazardous material inspection and removal in Phase 1, landowners had two options for fire debris and removal:

1. Consolidated Debris Removal Program. Under this program, the debris removal, cleanup, disposal and soil testing is completed by the USACE and their contractors at no cost to the landowner.
2. Alternative Debris Removal Program. If a landowner opts-out of the Consolidated Debris Removal Program, they are responsible for following the same steps as the USACE to remove, dispose and test their parcel to ensure that it is safe to rebuild.

The consolidated Debris Removal Program included removal of all ash and debris from the burn areas. Following removal of ash and debris, approximately 3 to 6-inches of soil was scraped from beneath the ash. Soil samples were then collected from the scraped areas and analyzed for 17 heavy metals in order to determine if all fire-impacted soil had been removed. If analytical results for the soil samples indicated remaining elevated concentrations of any of the target metals, the soil scrape, sample and test process was repeated until results indicated that the soil did not contain concentrations of metals exceeding State of Hawaii Department of Health HDOH, Hazard Evaluation and Emergency Response (HEER) Environmental Action Levels (EALs) (Hawaii Technical Guidance Manual (TGM) EALs, Table A-1/A-2, HDOH-HEER, 2017).



These programs are detailed on the mauirecovers.org website.

David Malo Development

The David Malo Development was completely destroyed by the fire. All structures were burned, with only ash, debris (concrete and steel) remaining. At the time of the site visit, the ash and debris had been completely removed from former building locations at the site, the surface soil (top 6-inches) scraped, soil samples collected and analyzed and clean gravel placed on top of the clean tested soil, as per the USACE Consolidated Debris Removal Program described above.



Photo 1: David Malo Site, USACE cleanup progress signage.



Photo 2: David Malo site condition. Note USACE-placed clean gravel and erosion protection at each former building location. Also note clear areas of soil (not gravel) was not included in USACE cleanups and may need to be tested prior to redevelopment/grading, etc.

Piilani Development

The Piilani Development was partially destroyed by the fire. Three buildings, a community center and a pavilion were burned, with only ash, debris (concrete and steel) remaining while five structures were not significantly impacted by the fire (the structures did not burn but may have been impacted by smoke and ash). At the time of the site visit, the ash and debris had been completely removed from the burned former building sites, the surface soil (top 6-inches)



scraped, soil samples collected and analyzed and clean gravel placed on top of the clean tested soil, as per the USACE Consolidated Debris Removal Program described above.



Photo 3: Piilani Site, USACE cleanup progress signage.



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Photo 4: Piilani site, former recreation/community center location. Cleanup has been completed. Note unaffected buildings in the background.



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Photo 5: Piilani site buildings that were not burned (5 buildings remain onsite).



NOTES AND RECOMMENDATIONS

Based on the site visit conducted on September 10, 2024, the following was observed/noted:

1. Both the David Malo and Piilani sites have been cleaned up through the USACE Consolidated Debris Removal Program.
2. There are no remaining tasks to complete for the David Malo Site at the burned building areas that have been cleaned up by the USACE
3. There are no remaining tasks to complete at the Piilani Site at the burned building areas that have been cleaned up by the USACE.
4. Additional sampling of surface soil may be necessary prior to/during redevelopment of both the David Mala and Piilani sites, as areas that were not scraped of surface soil (see photos 2 and 5) may have been impacted by the fire (ash/soot and debris) and could contain fire-related contaminants such as heavy metals.
5. The remaining buildings at the Piilani site were not accessed or inspected during the site visit. We would suggest that the buildings are inspected for potential damage to building materials that could be hazardous (e.g., asbestos containing materials, lead-based paint, damaged PCB-containing light ballasts, etc.).



APPENDIX D

**Significance Evaluation for Proposed Demolition of:
Piilani Homes, 1028 Wainee Street,
Lahaina, Maui, TMK: (2) 4-5-007:005 and David Malo Circle,
723 Mill Street, Lahaina, Maui, TMK: (2) 4-6-010:028
September 2024
Prepared by: Mason Architects, Inc.**



September 20, 2024

Ronald Sato, AICP
Bowers + Kubota
94-408 Akoki Street #201A
Waipahu, Hawai'i 96797

119 Merchant Street
Suite 501
Honolulu, HI 96813

P 808.536.0556
F 808.526.0577

MASONARCH.COM

Re: Section 106 Consultation Support
Proposed Demolition of: Pi'ilani Homes, 1028 Waine'e Street, Lahaina, Maui,
TMK: (2) 4-5-007:005; and
David Malo Circle, 723 Mill Street, Lahaina, Maui, TMK: (2) 4-6-010:028
HICRIS No. [PENDING]

Dear Mr. Sato,

We are providing our evaluations of significance and effect below regarding Hawai'i Public Housing Authority's (HPHA) proposed project to demolish the extant buildings at Pi'ilani Homes and David Malo Circle, Lahaina, Maui. As this project may receive funding from the U.S. Department of Housing and Urban Development (HUD) it is considered a federal undertaking per Section 106 of the National Historic Preservation Act (NHPA) of 1966. The Undertaking proposes to demolish the remaining five buildings at HPHA's Pi'ilani Homes development, which were spared by the August 2023 Lahaina wild fire. All of the David Malo Circle buildings were destroyed by the August 2023 fire; none are extant.

Pre-Fire Significance Evaluations (2015 and 2021)

In 2015 and 2021, Fung Associates, Inc. (FAI) completed architectural surveys for David Malo Circle and Pi'ilani Homes.¹ Their findings were as follows:

- FAI evaluated the Pi'ilani Homes housing area (comprised of nine buildings) as eligible for the National Register of Historic Places (NRHP) under Criteria "A" and "C." (It was comprised of eight single-story apartment buildings, Bldgs. A-H, and one single-story community building, all built in 1969.²)
- FAI evaluated the David Malo Circle housing area (comprised of nine duplexes) as not meeting NRHP significance criteria. (It was comprised of one two-story and eight one-story buildings, Bldgs. 101-109, built in 1966.³)

Refer to Attachment C for selected pages from FAI's pre-fire architectural surveys.

¹ Fung Associates, Inc., *Architectural Inventory Survey for Hawaii Public Housing Authority (Federal Project)* (Honolulu: Prepared for Hawaii Public Housing Authority and HHF Planners, 2015), 59-63; Fung Associates, Inc., *Architectural Reconnaissance Level Survey for Hawaii Public Housing Authority (Federal Projects)* (Honolulu: Prepared for Hawaii Public Housing Authority and HHF Planners, 2021), 152-176.

² Fung Associates, Inc., *Architectural Reconnaissance Level Survey for Hawaii Public Housing Authority (Federal Projects), Final Report, February 2021* (Honolulu: Prepared for Hawai'i Public Housing Authority and HHF Planners, 2021), 153-154, in HHF Planners, *Hawaii Public Housing Authority Environmental Review, Pi'ilani Homes, Lahaina, Maui County, AMP 39, HPHA No. 1044* (Honolulu: Prepared for State of Hawai'i, Hawai'i Public Housing Authority, 2023), Exhibit C.

³ Fung Associates, Inc., *Architectural Inventory Survey Hawaii Public Housing Authority (Federal Projects)* (Honolulu: Prepared for Hawai'i Public Housing Authority and HHF Planners, 2015), 59.



Post-Fire Site Visit Findings

In September of 2024 we made a site visit to Pi'ilani Homes and David Malo Homes to learn of the level of damage caused by the Lahaina wildfire of August 2023 and determine whether the damage would alter FAI's previous significance findings. The following was observed on site:

- Within the Pi'ilani Homes development, four of the original nine buildings were destroyed by fire and their foundations appear to have been removed during debris removal by the Army Corps of Engineers. Buildings B, C, G, and the community building were destroyed. Buildings A, D, E, F, and H remain. (Refer to Attachment A for additional information on Pi'ilani Homes post fire.)
- Within the David Malo Circle development, all nine of the duplexes were destroyed by fire and their foundations appear to have removed during debris removal by the Army Corps of Engineers. (Refer to Attachment B for additional information on David Malo Circle post fire.)

In consideration of these changes that have occurred to the two sites as a result of the August 2023 wildfire, our Section 106 consultation findings are below.

36 CFR 800.4 (a)(1) – Determine and Document the Area of Potential Effect (APE)

The recommended APE for architectural resources is as follows.

- Pi'ilani Homes: The development's entire 2.45-acre parcel, as shown in Figures 1 and 2 (Attachment A).
- David Malo Circle: The development's entire 1.56-acre parcel, as shown in Figures 11 and 12 (Attachment B).

Note: This recommended architectural APE will likely need to be combined with an APE supplied by your archaeological consultant (if applicable), as well as the APE recommended by others for the construction work (laydown space, transportation routes, etc.).

36 CFR 800.4 (b) – Identification of Historic Properties

The historic properties identified within the APEs are as follows:

- Pi'ilani Homes APE: Since the Pi'ilani Homes housing area has lost integrity and is no longer evaluated as eligible for the NRHP (see discussion in 36 CFR 800.4 [c] below), the only historic property in the APE is the Lahaina National Historic Landmark (NHL) District. However, this portion of the Landmark District does not retain historic integrity and should be considered a non-contributing feature of the NHL.⁴
- David Malo Circle APE: Since the David Malo Circle housing area has lost integrity and is no longer evaluated as eligible for the NRHP (see discussion in 36 CFR 800.4 [c] below), the only historic property in the APE is the Lahaina NHL District. However, this portion of the Landmark District does not retain historic integrity and should be considered a non-contributing feature of the NHL.

⁴ The National Park Service (NPS) initially designated the district a National Historic Landmark in 1960s. The district's boundaries were expanded in 1974.



36 CFR 800.4 (c) – Evaluation of Significance

MASON offers the following updated evaluations of significance and integrity in consideration of the changes to the APEs post fire:

- Pi'ilani Homes housing area is evaluated as no longer meeting the NRHP significance criteria. Although it was previously evaluated as historically significant for its associations with Hawai'i's sugar industry of the late 1960s and 1970s as an intact example of a housing area for retired sugar workers, nearly half of the development was destroyed by the August 2023 fire and it no longer has the ability to convey the associations of an intact neighborhood to an observer. Therefore, it does not meet NRHP significance Criterion "A." Further, although it was previously evaluated as an intact example of an early 1970s elderly public housing project that employed a garden layout with a central landscaped mall area, the August 2023 fire substantially altered its layout by the demolition of four of the nine buildings. The fire also destroyed its landscaping. Therefore, it lacks sufficient integrity to convey its original garden layout with central landscaped mall, and no longer meets Criterion "C." (For additional information, refer to the Post-Fire Integrity Assessment in Attachment A.)
- David Malo Circle was evaluated as not meeting NRHP Criteria in FAI's previous architectural survey. All nine buildings were destroyed by the fire and it remains not eligible for the NRHP.

36 CFR 800.5 – Assessment of Adverse Effects

The Undertaking involves demolition of the remaining buildings at Pi'ilani Homes. No demolition work will be required at David Malo Circle because it contains no remaining buildings.

MASON proposes a "Finding of no adverse effect" for the Undertaking, as neither Pi'ilani Homes nor David Malo Circle are eligible for the NRHP, and the demolition of the Pi'ilani Homes buildings will not adversely affect a historic property. Further, the Undertaking will not adversely affect the Lahaina NHL as the two neighborhoods should not be considered contributing features of the district due to their lack of historic integrity.

You may use the information from this letter to work with the Hawai'i Public Housing Authority and the U.S. HUD to support the Section 106 process.

Regards,

A handwritten signature in black ink that reads 'Polly Tice'.

Polly Tice
Principal and Research Section Director





Attachment A: Pi'ilani Homes Additional Information



Figure 1. Pre-fire aerial image of Pi'ilani Homes, showing APE. (HHF Planners, 2023)



Figure 2. Post-fire aerial image of Pi'ilani Homes, showing buildings destroyed by fire (outlined in light blue). (aerial image: Google, 2023; graphics: MASON, 2024)





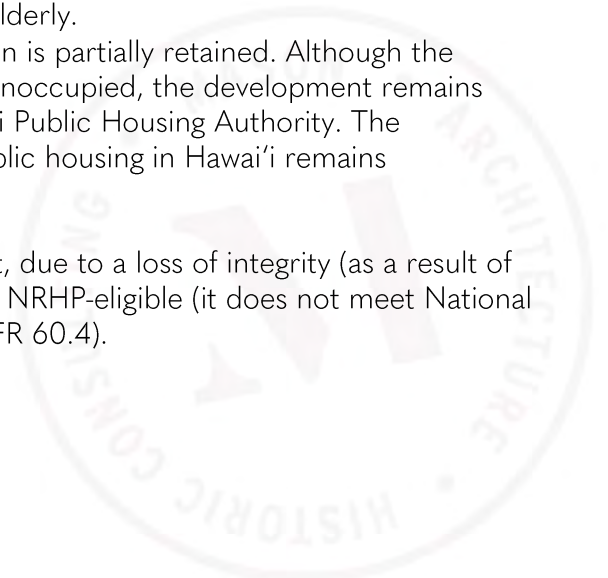
(Attachment A Cont.)

Pi'ilani Homes Post-Fire Integrity Assessment

While some buildings remain, and therefore some aspects of integrity are partially retained, Pi'ilani Homes lack sufficient integrity to meet the NRHP Criteria as follows:

- Location – Integrity of location is retained. The neighborhood development is in its original location.
- Setting – Integrity of setting is not retained. Where debris cleanup has occurred within the housing area, original landscaping has been removed and the lot's grade has been altered to account for any potential hazardous materials. Any original landscaping that was unharmed by the fire has either died or become overgrown/covered in weeds.
- Design – Integrity of design of the overall neighborhood is not retained. Before the fire, FAI determined that Pi'ilani Homes was significant for its garden layout with central landscaped mall. With four of the nine buildings destroyed by fire and no longer extant, this layout has been altered. The central landscaped mall now lacks buildings on its mauka, makai, and northwestern edges. Additionally, FAI stated that the design consistency among the buildings allowed the entire complex to be perceived as a distinctively identifiable whole. With nearly half of the development's buildings gone, this is no longer discernable.
- Workmanship – Integrity of workmanship is partially retained. For the remaining buildings, the vernacular method of construction they employed is still discernable.
- Materials – Integrity of materials is partially retained. For the remaining buildings, their simple materials, including concrete masonry unit (CMU) walls, plywood covered gables with plywood battens, aluminum framed sliding doors (for back lanai), and aluminum framed glass jalousies are all still discernable.
- Feeling – Integrity of feeling is not retained. Because the remaining buildings are vacant and half of the development, along with much of its landscaping and its central mall area, is no longer extant it no longer retains its feeling as a public housing complex for the elderly.
- Association – Integrity of association is partially retained. Although the remaining buildings are currently unoccupied, the development remains under the ownership of the Hawai'i Public Housing Authority. The development's association with public housing in Hawai'i remains unchanged.

Based on the above, MASON found that, due to a loss of integrity (as a result of fire damage), Pi'ilani Homes is no longer NRHP-eligible (it does not meet National Register Criteria, as established in 36 CFR 60.4).

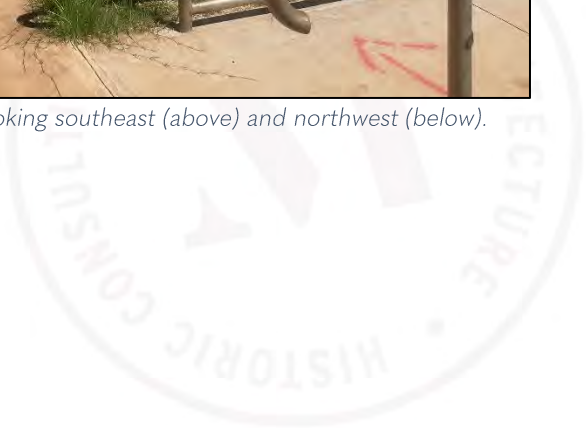




Post-fire images of Pi'ilani Homes



Figure 3. Location of former community building, looking southeast (above) and northwest (below). (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 4. Central mall between Buildings A and H (above), and northwest and southwest facades of Building A (below). (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 5. Southwest facade of Building A (above) and northwest and northeast facades of Building H (below). (MASON, September 2024)



Post-fire images of Pi'ilani Homes



Figure 6. Northeast façade of Building H (above) and southeast facades of Buildings H and A with former location of Buildings G and B visible in the foreground (below). (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 7. Former location of Buildings B, C, and G with Buildings D, E, and F visible in the distance. (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 8. Buildings D, E, and F, looking northwest (above) and northwest and southwest facades of Building D (below). (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 9. Northeast façade of Building E (above) and northeast façade of Building F (below). (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 10. Former location of Building G (above) and Former Location of Building G with former location of Building C visible to the left (MASON, September 2024)



Attachment B: David Malo Circle Additional Information



Figure 11. Pre-fire aerial image of David Malo Circle, showing APE. (HHF Planners, 2021)

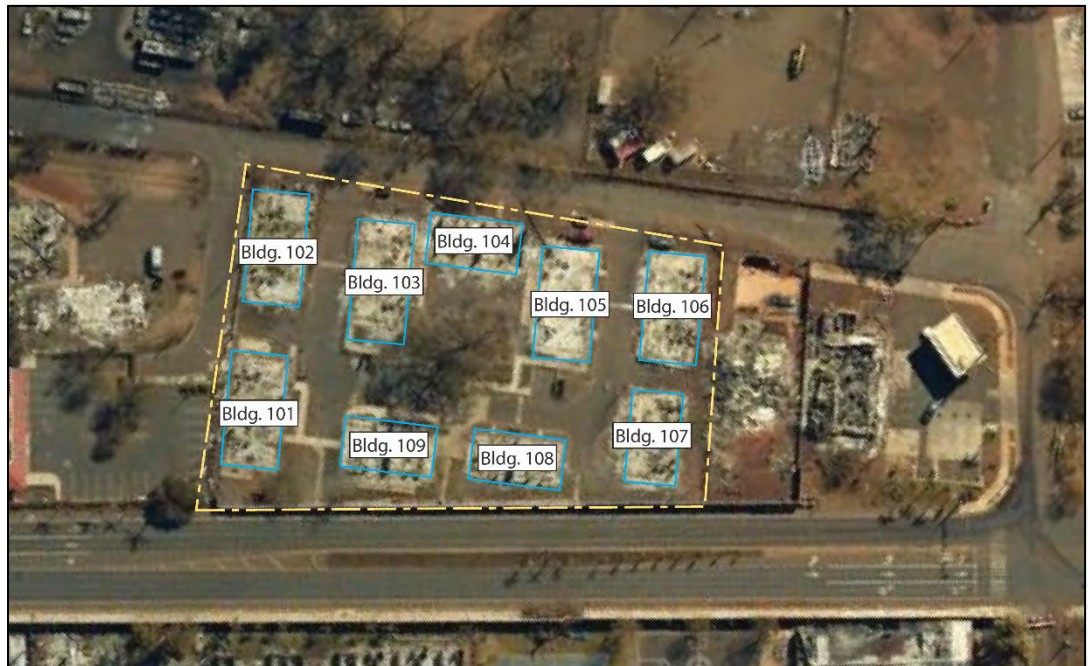


Figure 12. Post-fire aerial image of David Malo Circle, showing buildings destroyed by fire (outlined in light blue). (aerial image: Google, 2023; graphics: MASON, 2024)





Post-fire images of David Malo Circle



Figure 13. Location of former David Malo Circle development, camera facing southwest (above) and north-northwest (below). No buildings are extant, following the fire. (MASON, September 2024)





Post-fire images of David Malo Circle

(Attachment B Cont.)



Figure 14. Location of former David Malo Circle development, camera facing southwest (above) and southeast (below). (MASON, September 2024)



Attachment C: Selected Pages from FAI's Pre-Fire Architectural Surveys





Source: State of Hawaii GIS Data and Google Earth Pro - 1/12/2013

HPHA No. 1044 - Pi'ilani Homes (AMP 39)

Figure 2 - Project Site & APE Map

Lahaina, Maui



50 FEET



EXHIBIT C
Architectural
Reconnaissance Level
Survey (ARLS) for Hawaii
Public Housing Authority
(FEDERAL PROJECTS)
Final Report February, 2021
Prepared By:
Fung Associates Inc.

Architectural Reconnaissance Level Survey for
Hawaii Public Housing Authority
(FEDERAL PROJECTS)

Final Report
February, 2021

Prepared By:
Fung Associates Inc.
1833 Kalakaua Avenue, Suite 1008
Honolulu, HI 96815

For:
Hawaii Public Housing Authority
and HHF Planners

EXECUTIVE SUMMARY

This report records the findings of a historic architectural reconnaissance level survey (RLS) of selected public housing projects operated by the Hawaii Public Housing Authority (HPHA), which was previously known as the Housing and Community Development Corporation of Hawaii (HCDCH) by 1998; and the Hawaii Housing Authority (HHA) until 2005. For purposes of this report, the historic name Hawaii Housing Authority will be utilized only within its historic context. This survey was undertaken in anticipation of future HPHA projects utilizing federal funding and fulfills the 36 CFR.800 requirement for identification of historic properties.

The objective of the survey is to study twelve HPHA housing projects that have recently reached age of eligibility (50-year mark), and two HPHA individual buildings. The surveyed properties are projected to undergo repairs and rehabilitation in the not too distant future, and was evaluated to determine eligibility as a historic resource. In keeping with the Advisory Council for Historic Preservation guidelines, this report identifies those which appear to meet the criteria for listing in the National Register of Historic Places.

Each of the housing projects covered in this report was visited, photographed, researched, and evaluated for historic significance. After consideration of each resource in its historic context, seven of the twelve projects, and the Lanakila Community Center were considered to meet National Register eligibility criteria. Their significance is based on their role in the social history of Hawaii, being representative of the efforts of a State-wide housing reform movement, and/or for their architecture, being reflective of a type, style, method of construction, and materials utilized during the period in which they were constructed. The properties which were considered to not meet the criteria for listing in the National Register of Historic Places, were so evaluated because of their loss of integrity.

Table 1 summarizes these evaluations. The projects determined National Register eligible are highlighted.

Organization of Report

The first section of the report summarizes the National Register eligibility criteria. The second section covers the project objectives, while the third section covers the methodology and coverage. The fourth section covers the project boundary and justification. Section five includes a brief history of public housing in Hawaii focusing on the period approximately 1967-1980. The housing covered in the inventory either was constructed or came under the administration of the HHA. Section six includes RLS survey forms for each of the housing projects. These forms include descriptions of the property, a list of character defining features, historic contexts, descriptions, eligibility recommendations, historic assessment photos, and maps or site plans. The seventh section is a summary of National Register findings with recommendations. A bibliography is provided at the end of the report.

EXECUTIVE SUMMARY

HA #	Island	Project Name	Address	Year Built/ Occupied	Architect/Builder	National Register Eligibility
1004	Hawaii	Lanakila Homes II (Office and Baseyard Building)	Waiola Street. and Ipuka Street.	1952	Bruce Price Harden	Not Eligible
1004	Hawaii	Lanakila Homes II (Community Center)	Waiola Street. and Ipuka Street.	1969	Tom Mizuno	Eligible
1023	Kauai	Home Nani	Moana Road. and Laau Road.	1970	Michael T. Suzuki & Associates	Eligible
1031	Hawaii	Hale Hauoli	45-540 Koniaka Place.	1970	Wilson, Okamoto & Associates	Eligible
1032	Hawaii	Kaimalino	74-5060 Kealakaa Street.	1971	Walter Tagawa	Not Eligible
1036	Oahu	Paoakalani	1583 Kalakaua Avenue.	1970	Luke, Miyamoto & Associates	Eligible
1038	Oahu	Waipahu I	94-111 Pupule Place.	1970	Robert G. Helg	Not Eligible
1039	Oahu	Waipahu II	94-132 Pupupuhi Street.	1969	Steve Au	Not Eligible
1044	Maui	Piilani Homes	1028 Wainee Street.	1970	Noboru Kobayashi	Eligible
1045	Hawaii	Pahala	96-1169 Holei Street.	1972	Frank Slavsky & Associates	Eligible
1046	Oahu	Makamae	21 South Kuakini Street.	1971	Milton Sher. Architect & Associates	Eligible
1047	Oahu	Pumehana Homes	1212 Kinau Street.	1972	Walter K. Tagawa, A.I.A. & Associates.	Eligible
1066	Oahu	Salt Lake Apartments	2907 Ala Ilima Street.	1969	Edward Miyamasu, A.I.A	Not Eligible
1073	Oahu	Spencer House	1035 Spencer Street.	1968	J. Paul Rognstad & Associates, Inc.	Not Eligible

Table 1: Summarizing National Register Eligibility Evaluation (Chronological Order of HA #)
Source: Fung Associates Inc., 2020

While we greatly respect and honor the Hawaiian language as *ka olelo makuahine o Hawaii* (the mother tongue of Hawaii) and recognize it is one of two official languages in the State of Hawaii, we acknowledge that the global use and readability of diacritical markers (the *kahako* and *okina* macron and glottal stop, respectively) in electronic formatting may cause words to display incorrectly when presented in different documentation and databases. Accordingly, diacritical markers have been omitted from Hawaiian words and place names in this report, and we apologize for its non-inclusion in this draft. Mahalo for your understanding in this regard.

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NATIONAL REGISTER OF HISTORIC PLACES ELIGIBILITY CRITERIA

In order to determine the significance of a historic property, the property must be evaluated based on the National Register of Historic Places' Criteria for Evaluation. The following excerpt was taken from the National Register Criteria, Title 36 CFR, §60.4, Criteria for Evaluation:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

A. *that are associated with events that have made a significant contribution to the broad patterns of our history; or*

B. *that are associated with the lives of persons significant in our past; or*

C. *that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or*

D. *that have yielded, or may be likely to yield, information important in prehistory or history.*

National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation* provides an explanation on how to apply the criteria listed above. In summary, historic resources are evaluated by applying the four-significance criteria A through D, and then determining which of the seven aspects of integrity are present to convey its significance: location, design, setting, materials, workmanship, feeling, or association.

STATEMENT OF PROJECT OBJECTIVES

MAPS



1 HISTORIC ASSESSMENT MAP - WAIPAHU II
SCALE: NOT TO SCALE

Figure 132: Waipahu II Historic Assessment Map
Source: Fung Associates Inc., 2020

PIILANI HOMES

HISTORIC PROPERTY INFORMATION AND ASSESSMENT SUMMARIES

Project Name	Piilani Homes
Historic Name	N/A
Architect/Builder	Noboru Kobayashi
Built	1969 (Built), 1970 (Occupied)
National Register Eligibility	Eligible
Criteria	A and C
Significance	Association with history of the Hawaii Housing Authority and with the efforts undertaken by the sugar industry in the late 1960s and 1970s to provide housing for its retired workers. Architecturally significant as an early 1970s elderly public housing project using a garden layout focused on a central landscaped mall area.
Character Defining Features	Single-story building masses, lateral running, composition shingled gable roofs, overhanging eaves with exposed rafter tails, concrete slab foundation, CMU walls with plywood and batten gable ends, concrete sidewalks, jalousie windows, intact original floorplan, garden layout focused on a central landscaped mall area

State Historic Preservation Division
Reconnaissance Level Survey - Survey Form
Individual Resource Information

4. Property Location	5. Property Classification:
4.1 TMK [e.g. (1) 1-2-003:004]: (2) 4-5-007:005	5.1 Ownership <input type="checkbox"/> Private <input checked="" type="checkbox"/> Public
4.2 Street Address: 1028 Waivee Street	5.2 Classification
4.3 County: Lahaina	<input checked="" type="checkbox"/> Building <input type="checkbox"/> Structure
4.4 State: Hawaii	<input type="checkbox"/> District <input type="checkbox"/> Object
4.5 Zip Code: 96761	<input type="checkbox"/> Site

6. Property Function:	
6.1 Current: Residential	6.2 Historic: Residential

7. Property Description
7.1 Date of Construction: 1969 (Built) 1970 (Occupied)
7.2 Provide a description of the property, including the character defining features, summarize alterations to the property, and provide an evaluation of the property's integrity of materials, design, feeling, location, association, workmanship, and setting.

Piilani Elderly Housing is located on a flat lot in the town of Lahaina between Waivee Road and Honoapiilani Highway, in a predominantly apartment/commercial retail area. Sited on a 2.62 acre parcel this housing project consists of eight single story apartment buildings of 1-bedroom and studio units. In addition, there is a free-standing community meeting building which also contains a laundry room and an office and storage.

The property is entered from Waivee Road, where a chain link enclosed, paved, parking lot defines the northwest terminus of the trapezoidal shaped property. A chain link fence also encloses the residential portion of the property with a concrete sidewalk leading from the parking lot to the community center building which has a southwest-northeast orientation and defines the northwest end of the mall. The eight apartment buildings are sited around a central mall, with three buildings (A, B, C and F, G, H) on each side of the mall and two buildings (D and E) defining the southeast end of the mall (Refer to Figure 133 Piilani Building Type Map).

PROPERTY DESCRIPTION

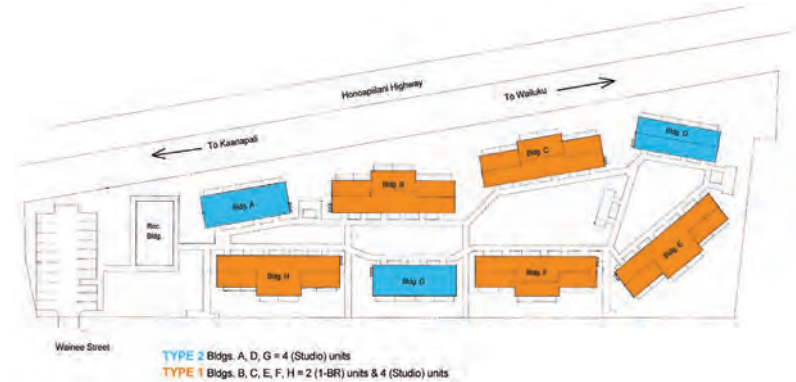


Figure 133: Piilani Building Type Map
 Source: Fung Associates Inc., (2020)
 Base Image: Provided by the HPHA (Accessed 2020)

There are two types of apartment buildings which house an overall total of ten, 1-bedroom and thirty-two studio units:

- Type 1 (Building B, Building C, Building E, Building F, and Building H). Each Type 1 building consists of two 1-bedroom apartments, and four studio units.
- Type 2 (Building A, Building D, Building G). Each Type 2 building consists of only four-studio units.

The mall is a lawn with several mature trees planted in it, which include: mountain apple (*Eugenia malaccensis* plumeria (*Plumeria* sp), and Norfolk pine (*Araucaria heterophylla*), as well as such shrubs as Chinese hibiscus (*Hibiscus rosa-sinensis*), ti (*Cordyline terminalus*) and a mock orange hedge (*Murraya paniculata*).

PROPERTY DESCRIPTION

The community meeting building sits on a concrete slab foundation and has concrete masonry unit (CMU) walls. It has a front facing, composition shingled gable roof with overhanging eaves with exposed rafter tails. The gable ends are of plywood with battens. The building faces southwest and has two pairs of aluminum sliding doors to serve as entries. The sliding doors open on the meeting room, which has a vinyl tile floor and a gypsum board ceiling. In addition to the front doors, a set of double doors on the southeast side and two more sets of double doors on the northwest side provide access to the meeting room. In addition, the housing project's mailboxes are in the southeast wall of the building, and a door near the rear on this side accesses the laundry room. Double doors in the rear wall of the building open on a large storage room. Also, a single door in the rear elevation accesses an office. All windows are jalousie with crank handles, with the restroom windows in the southeast wall being placed at the top of the wall.

All the apartment buildings are single story with lateral running, composition shingled, gable roofs with overhanging eaves with exposed rafter tails. The buildings are similar to the community meeting hall in that they sit on a concrete slab foundation, and have CMU walls with plywood and batten gable ends. Concrete sidewalks run in front of the buildings and connect one building to another. In addition, a concrete sidewalk runs along the length of the rear of each building.

Type 2 (Building A, Building D, Building G) are four bays long with each bay containing a front door with a screen door, flanked on one side by a narrow, near floor to ceiling jalousie window and on the other by a pair of wider, near floor to ceiling jalousie windows. On the interior, the studio units have vinyl tile floors with 3-inch high baseboards and gypsum board ceilings. Drywall is used for the partition walls to enclose the closets and bathroom. The main space is an L-shape with the kitchen located behind the front door in the bottom of the L. Some of the kitchens retain their pressed wood cabinets, countertop and stainless-steel sink which may be original, however, these are in poor condition and are being replaced. The narrow jalousie window is in the kitchen's front wall. The bathroom and closets are to

PROPERTY DESCRIPTION

the rear of the kitchen and accessed from a door in the side wall of the living room. The bathroom has a separate alcove for the toilet. The original scalloped sink sits in a pressed wood cabinet and the tub has a shower. A narrow, near floor to ceiling jalousie window, similar to that in the kitchen is in the back wall of the bathroom. In the same wall as the bathroom door is a closet with a pair of sliding doors. In the rear wall of the living room is a pair of aluminum sliding doors which open on a small concrete patio and the backyard.

Type 1 Buildings (Building B, Building C, Building E, Building F, and Building H) are six bays long. They have a continuous straight wall line across their fronts, but in the rear the two center bays project outward. The two bays at each end of the building contain the studio units and these are identical to the studio units in the Type 2 Buildings, which are exclusively studio buildings, on both the exterior and interior. The facades of the Type 1 Buildings one-bedroom units have a pair of near floor to ceiling jalousies on one side of the door, but on the other, as opposed to the long narrow jalousie of the studio units, it has a full sized, near floor to ceiling jalousie window. On the interior the living room runs the width of the unit and a dry wall partition wall separates the kitchen from the living room. The kitchen is to the rear of the living room and is accessed by the living room flowing around the partition wall at one end. The kitchen is long and narrow, with the sink and stove against the wall separating the room from the living room and the refrigerator on the opposite wall. Both sides of the kitchen have cabinets and counter space. The counters and cabinets have been replaced in many units. A door in the rear wall of the kitchen opens on the bedroom. The bedroom has a set of aluminum sliding doors in its rear wall, and a closet with sliding doors in its front wall. The bathroom is through a door in the bedroom's sidewall behind the kitchen. It includes a tub and, in many units, has been remodeled.

PROPERTY DESCRIPTION

Character Defining Features:

- Single story building masses
- Lateral running, composition shingled, gable roofs
- Overhanging eaves with exposed rafter tails
- Concrete slab foundation
- CMU walls with plywood and batten gable ends
- Concrete sidewalks run in front of the buildings and connect one building to another
- Jalousie windows
- Intact original floorplan
- Garden layout focused on a central landscaped mall area

8. Eligibility Recommendation:

8.1 Provide a recommendation of eligibility to the Hawaii Register of Historic Places including applicable criteria and areas of significance.

Piilani Homes remains relatively intact, whereas the layout of the complex and the exteriors of the buildings remain very intact. The only major changes to the site are on the interior and involve the remodeling of a number of the kitchens and bathrooms. Some jalousie windows and their mechanisms have been replaced, but these have been in-kind replacements. These alterations are not sufficient to affect the historic character of the building in a significant manner. As such, the complex retains its integrity of location, setting, design, materials, workmanship, feelings and associations.

Piilani Homes appear to be significant at a statewide level under **Criterion A** for its associations with the efforts undertaken by the sugar industry in the late 1960s and 1970s to provide housing for its retired workers. Piilani Homes was designed as a turnkey project. This development approach had been inaugurated by the Department of Housing and Urban Development (HUD) in 1966, and was first utilized in Hawaii in 1969 for the development of Maile I, Nanakuli Homes and Maile II. Under this program a private developer would approach a local housing authority with a proposed site and a building proposal which met federal standards. Prior to the start of construction, the local authority would provide the developer a letter of intent to purchase the development once it was constructed, and the federal government would provide the developer interim financing until a private source of funding was secured. Thus, dwellings were built by private developers just as any other subdivision or apartment, but with the guarantee that the local housing authority would purchase the entire subdivision or building upon its completion.

This new vehicle for the construction of low-cost housing offered a number of benefits to both the public and the developer. It was found that the private sector could build affordable housing faster and at a 10-15% lower cost than the government. In turn, the developer did not need to be concerned about selling the property once it was completed, which at the front end made obtaining financing easier. The new approach also promoted a diversification of designs, methods and locations, all of which

ELIGIBILITY RECOMMENDATIONS

had become federal policy concerns during the 1960s. Because of such added flexibility, it was felt the turnkey approach would aid in distributing low-income families throughout the community. The turnkey approach, was believed to elevate the life styles of lower income families by having them live in the same environment with families of higher income levels. This would allow less possibility of being specifically identified as public housing tenants, and provides a scattered number of sites that prevent large concentrations of low-income families.¹ This provides opportunities for economic and social development for low-income families. In addition to Piilani Homes, Home Nani on Kauai and Pahala Elderly Housing on the Hawaii island utilized the turnkey approach to development.

Piilani Homes was undertaken by Amfac, the owner of the Pioneer Mill Sugar Company in Lahaina, and was designed by Maui architect Noboru Kobayashi. The housing was built on Amfac's lands and was developed by them to house their retired plantation employees. Ground was broken on the \$800,000 project in February 1970, with construction undertaken by F & M Contractors of Wailuku. By the end of August 1970, when the property was turned over to the HHA, the first seven occupants had already moved into their new homes.

Piilani Homes was part of an effort by the HHA to develop elderly housing for retired plantation workers on the neighbor islands. Other projects included Home Nani in Waimea, Kauai, Hale Hauoli in Honokaa, and C. Brewer's Pahala Elderly Housing all of which utilized the turnkey approach to development. As opposed to the high-rise elderly housing projects undertaken on Oahu, the neighbor island elderly housing projects were all single-story buildings.

¹ Dewa Y. Roger, and Stanley A. Patrick, "Public Housing In Hawaii-The Evolution of Housing Policy Volume 1: Description and Analysis," *Legislative Reference Bureau*, University of Hawaii, 1967

ELIGIBILITY RECOMMENDATIONS

Piilani Homes also meets **Criterion C** as a good example of an early 1970s elderly public housing project developed by the HHA on Maui, using a garden layout focused on a central landscaped mall area. Piilani Homes is typical of its period in its move away from the Zeilenbau planning (long and shallow apartment blocks, organized in parallel rows, spaced widely) approach to public housing and to a more suburban, residential approach. A similar approach was also applied to the elderly housing projects Home Nani on Kauai (1970), Hale Hauoli (1970) and Pahala Housing (1972) on the island of Hawaii. An informal, non-institutional atmosphere is achieved through Piilani Homes scattering of the two different building types throughout the housing project, and its use of a central landscaped mall area. The buildings' design consistency allows the entire complex to be perceived as a distinctly identifiable whole.

The architect for Piilani Homes was Maui architect Noboru Kobayashi. In the late 1930s he worked as a draftsman for the Maui County Public Works Department and by the early 1950s had become the head of the Maui County Building Inspection Department and Superintendent of school repairs. In the mid-1950s he opened his own architectural office and designed such buildings as: Lahaina Public Library (1955), the Aluli Building on Market Street, Wailuku (1956), Andrew S. Freitas Residence (1958), Wailuku War Memorial Gym (1960), Kahului Public Library (1962), David Malo Dormitory at Lahainaluna (1962), Hale Makua Nursing Home (1964), Maui Savings & Loan (1965), Maui Health Center in Wailuku (1967), Maui Boy Scouts HQ (1968), and the J. Walter Cameron Center on the grounds of Maui Memorial Hospital (1969). He also developed the Kihei Master Plan (1969).

Piilani Homes appears to meet the criteria for listing in the National Register of Historic Places.

9. Photographs
 Attach Photographs: provide sufficient photographs to illustrate the property's main features. At a minimum provide the following:

Quantity	Description
1-2	Street view(s) of the resource setting
1-2	Main facades
1-2	Interior photos if applicable



Figure 134: Piilani Homes Entrance
 Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 135: Piilani Homes Building A Left Elevation (right side similar)
 Source: Fung Associates Inc., 2020



Figure 136: Piilani Homes Building A Front Elevation
 Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 137: Piilani Homes Building B Front Elevation
Source: Fung Associates Inc., 2020



Figure 138: Piilani Homes Building B Rear Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 139: Piilani Homes Building C Left Elevation (right side similar)
Source: Fung Associates Inc., 2020



Figure 140: Piilani Homes Building C Front Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 141: Piilani Homes Building D Rear Elevation
Source: Fung Associates Inc., 2020



Figure 142: Piilani Homes Building D Front Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 143: Piilani Homes Building E Rear Elevation
Source: Fung Associates Inc., 2020



Figure 144 bottom: Piilani Homes Building E Front Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 145: Piilani Homes Building F Side Elevation
Source: Fung Associates Inc., 2020



Figure 146: Piilani Homes Building F Front Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 147: Piilani Homes Building G Side and Rear Elevation
Source: Fung Associates Inc., 2020



Figure 148 bottom: Piilani Homes Building G Front Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 149: Piilani Homes Building H Side Elevation
Source: Fung Associates Inc., 2020



Figure 150: Piilani Homes Building H (Wainee Street View)
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 151: Piilani Homes Community Center Northeast Elevation
Source: Fung Associates Inc., 2020



Figure 152: Piilani Homes Community Center Southeast Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 153: Piilani Homes Community Center Laundry Room
Source: Fung Associates Inc., 2020



Figure 154: Piilani Homes Community Center Interior
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 155: Piilani Homes central mall
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 156: Piilani Homes Building A Studio Unit Interior Living Area
Source: Fung Associates Inc., 2020



Figure 157: Piilani Homes Building A Studio Unit Interior Kitchen
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 158: Piilani Homes Building H One-Bedroom Interior Kitchen
Source: Fung Associates Inc., 2020

10. Map

Attach Map showing the location of the property

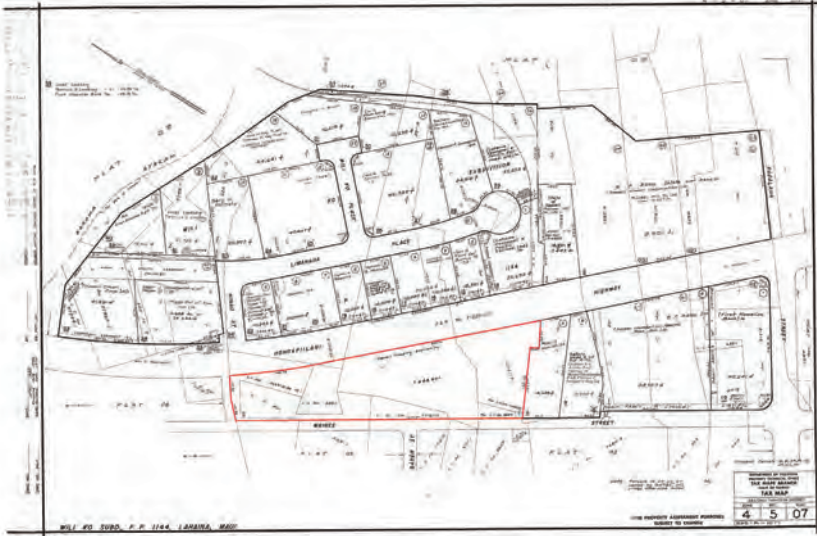


Figure 159: Pili Homes TMK Map
Source: City and County of Honolulu, 2020



Figure 160: Pili Homes Site Map
Source: Google Earth, 2020

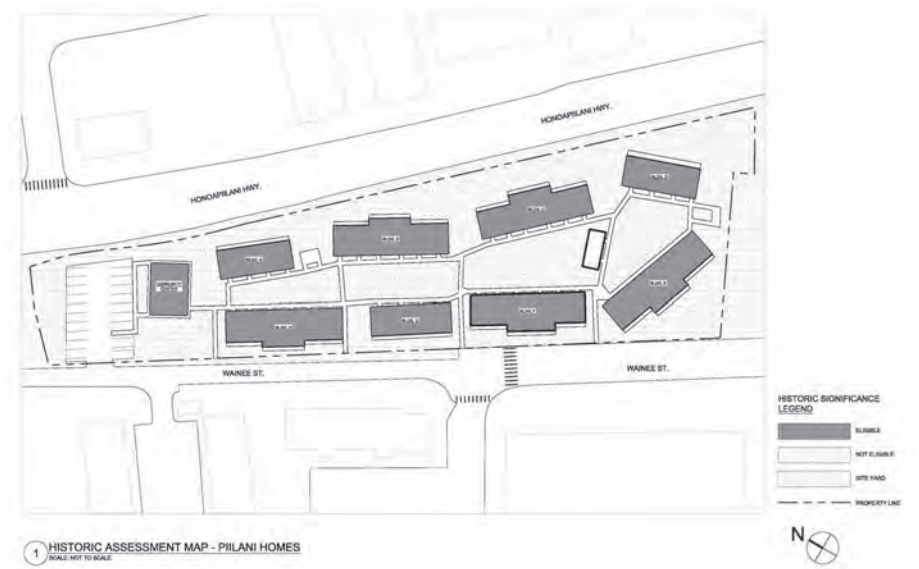


Figure 161: Pili Homes Historic Assessment Map
Source: Fung Associates Inc., 2020

**ARCHITECTURAL INVENTORY SURVEY
HAWAII PUBLIC HOUSING AUTHORITY
(FEDERAL PROJECTS)**

Prepared by
Fung Associates, Inc.
1833 Kalakaua Avenue, Suite 1008
Honolulu, HI 96815

For

Hawaii Public Housing Authority
and
HHF Planners

May, 2015

EXECUTIVE SUMMARY

This report records the findings of a historic architectural reconnaissance survey of selected public housing projects operated by the Hawaii Public Housing Authority (HPHA), which was previously known as Housing and Community Development Corporation of Hawaii (HCDCH); and Hawaii Housing Authority (HHA). It was undertaken in anticipation of future HPHA projects utilizing federal funding and fulfills the 36 CFR.800 requirement for identification of historic properties.

The objective of the survey was to study twenty-three HPHA housing projects targeted for repairs and rehabilitation, and to evaluate which properties should be considered historic resources. In keeping with Advisory Council for Historic Preservation guidelines, this report identifies those which appear to meet the criteria for listing in the National Register of Historic Places.

Each of the housing projects covered in this report was visited, photographed, researched, and evaluated for historic significance. After consideration of each resource, ten of the twenty three projects were considered to meet National Register eligibility criteria. Their significance is based on their role in the social history of Hawaii, being representative of the efforts of a Territory-wide and State-wide housing reform movement, and also for their architecture, being reflective of a type, style, method of construction, and materials utilized during the period in which they were constructed. All of the properties which were considered to not meet the criteria for listing in the National Register of Historic Places, were so evaluated because of their loss of integrity.

Table 1 summarizes these evaluations. The ten projects determined National Register eligible are highlighted.

Table 1: Summarizing National Register Eligibility Evaluation (Chronological Order)

	Island	Project Name	Project Type	Year Built	National Register Eligibility
1	Oahu	Puahala Homes I	State	1952	Not Eligible
2	Oahu	Puahala Homes II	State	1952	Not Eligible
3	Oahu	Kalihi Valley Homes	Federal	1953	Eligible
4	Oahu	Palolo Valley Homes	Federal	1957	Eligible
5	Oahu	Puahala Homes III	State	1959	Not Eligible
6	Oahu	Puahala Homes IV	State	1959	Not Eligible
7	Hawaii	Lokahi	State	1962	Eligible
8	Oahu	Hauiki Homes	State	1964	Eligible
9	Maui	David Malo Circle	Federal	1966	Not Eligible
10	Kauai	Eleele Homes	Federal	1966	Not Eligible
11	Kauai	Hui O'Hanamaulu	Federal	1966	Not Eligible
12	Maui	Kahekili Terrace (A & B)	Federal	1966	Eligible
13	Kauai	Kapaa	Federal	1966	Not Eligible
14	Oahu	Wahiawa Terrace	Federal	1966	Eligible
15	Kauai	Kalaheo Homes	Federal	1967	Not Eligible
16	Oahu	Makua Alii (Eld)	Federal	1967	Eligible
17	Hawaii	Pomaikai	Federal	1967	Not Eligible
18	Hawaii	Punahale Homes	Federal	1967	Eligible
19	Oahu	Kalanihuia (Eld)	Federal	1969	Eligible
20	Oahu	Koolau Village	Federal	1969	Not Eligible
21	Oahu	Maili I	Federal	1969	Not Eligible
22	Oahu	Nanakuli Homes	Federal	1969	Eligible
23	Oahu	Puuwai Momi	Federal	1969	Not Eligible

Organization of Report

The first section of the report summarizes the National Register eligibility criteria. The second section covers the survey scope and methodology, third is evaluation process and consideration, while the fourth is a brief history of public housing in Hawaii. Section five includes historic resource information and assessments for each of the housing projects. These include historic contexts, descriptions, maps or site plans, and one-page historic assessment photo and summary sheets. The sixth section is a summary of National Register findings and recommendations as to how to most efficiently comply with Section 106 requirements. A bibliography is provided at the end of the report.

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Kapaa	83
Wahiawa Terrace	87
Kalaheo Homes	98
Makua Alii (Eld)	101
Pomaikai	114
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NATIONAL REGISTER OF HISTORIC PLACES' ELIGIBILITY CRITERIA

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A. that are associated with events that have made a significant contribution to the broad patterns of our history; or

B. that are associated with the lives of persons significant in our past; or

C. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. that have yielded, or may be likely to yield, information important in prehistory or history.

National Register Bulletin No. 15, How to Apply the National Register Criteria for Evaluation provides an explanation on how to apply the criteria listed above. In summary, historic resources are evaluated by applying the four significance criteria A through D, and then determining which of the seven aspects of integrity are present to convey its significance: location, design, setting, materials, workmanship, feeling, or association.

DAVID MALO CIRCLE

DAVID MALO CIRCLE

Project	David Malo Circle
Architect	Takashi Anbe & Associates
Built	1966
National Register Eligibility	Not Eligible

Description

The David Malo Circle low cost housing project is comprised of nine duplexes, sited around a U-shaped roadway on a 1.56 acre site. It is bordered by Honoapiilani Highway and Mill Street, with access to the premises off Mill Street. The buildings are located on a flat parcel of land, and sit on poured in place, reinforced concrete slab foundations. Eight of the buildings are single story, and one, housing two four bedroom units is two stories. The eight single story duplexes vary in length, with one holding a pair of one bedroom units, two having two bedroom units, and five having three bedroom units. The central area formed by the U shaped roadway, is a park-like, open space with a lawn. The two story duplex is at the mini-park's Mill Street end, and a mature monkey pod is at the other. The rear of two three bedroom duplexes front on the "park" on either side. The buildings all feature composition shingled, double pitched hipped roofs with overhanging eaves and exposed rafter tails. The walls, originally tongue and groove, have been reinforced with T-111 on the exterior, but retain their girt. On the interior the tongue and groove partition walls remain intact. The kitchens and bathrooms have been remodeled, and jalousies have replaced the original windows. All interior doors are non-historic, and the bedroom closets have no doors. A cmu common wall separates the two side by side units in each of the duplexes.

No historic landscaping remains on the grounds, other than a monkey pod at one end of the open green space. (See Landscape Plan)



Two Stories Building



Typical Single Story Building



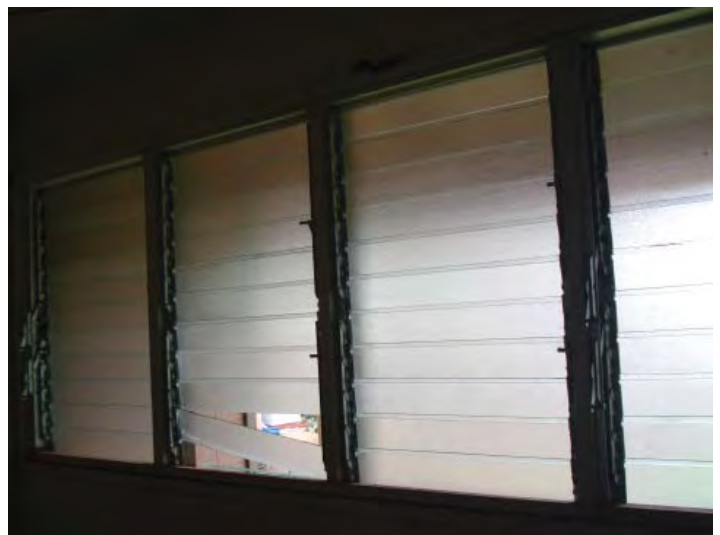
Open Central Area with Original Monkey Pod



Original Tongue and Groove Interior Wall

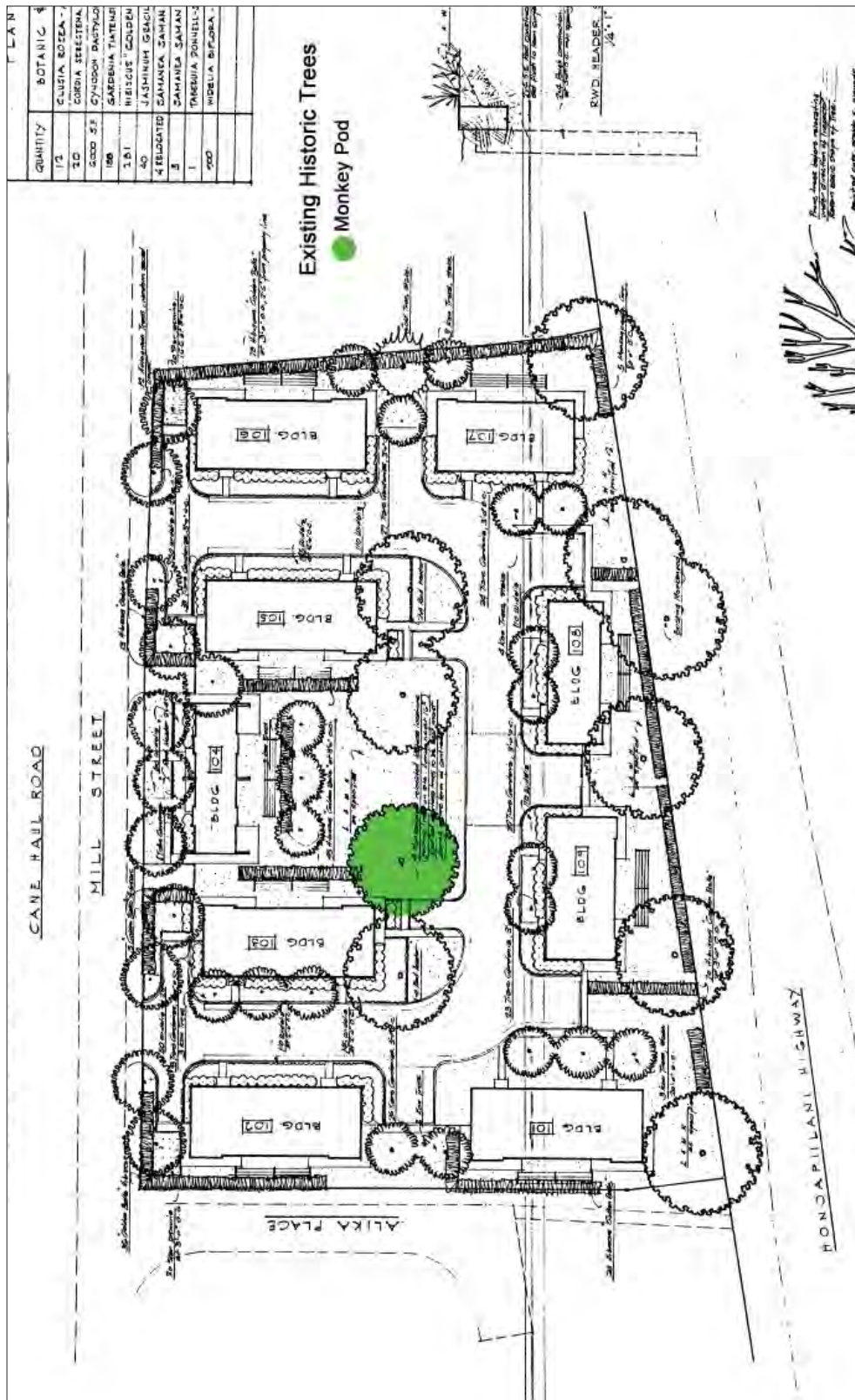


Renovated Kitchen



Jalousie Windows

DAVID MALO CIRCLE



Landscape Plan Shows Historic Trees
 Takashi Anbe & Assoc. Inc., *Landscape Plan Detail (David Malo Circle)*, Sheet 29, 1964, Hawaii Housing Authority.

History and Significance

David Malo Circle and Kahekili Terrace are the earliest known federally supported low cost housing projects on Maui. A contract for construction of the project was let in mid- 1965 to Hicks Construction Company, and in April 1966 the housing was dedicated.



Historic Photo of the Circle

This housing project is typical of the mid-to-late-1960s impetus on the part of HHA to move away from a more institutional Zeilenbau property plan and the international style of architecture to a design that more closely follows a typical suburban neighborhood form. Although an enclave unto itself, this housing project strives to integrate its design into the Lahaina community, and to be more regionally appropriate. In response to a request from the Lahaina Restoration Foundation, the HHA placed double pitched hipped roofs, or Hawaiian style roofs, on all the buildings, despite a twenty five percent higher cost for the roof and the fact that federal approval, “had been obtained with some difficulty.”²⁷ Donald H. Tokunaga, the Maui member on the

HHA board, indicated to the press, “We want to keep in line with the restoration plans and will cooperate with the [Lahaina Restoration] Foundation’s wishes provided it is within cost.”²⁸ The newspapers noted the similarity of the David Malo Circle roofs with those of the Wailuku Public Library designed by C. W. Dickey.

The architect for the project, Takashi Anbe, was born and raised on Maui, and received a degree in architectural engineering from Washington State University. Following World War II he joined Wimberly & Cook, and in 1956 opened his own office. The office later became Anbe Aruga and Ishizu, one of the more prominent firms working in Hawaii in the post-war period. Buildings by Anbe follow a clean line modern sensibility, as displayed by the King Center, the HGEA Building, and former City Bank on Queen Street, all in Honolulu, the Maui



Rendering of David Malo Circle

Prince Hotel, the Hilo State Office Building, and the Astronomy and Plant Science buildings at the University of Hawaii. In addition to David Malo Circle, Anbe also designed Kahekili Terrace for the HHA.

²⁷ Maui News, April 9, 1966.

²⁸ Maui News, October 19, 1963.

DAVID MALO CIRCLE

Nine projects were identified as embracing the informal, garden city, suburban planning precepts. These included: Lokahi Homes, Hauiki Homes, David Malo Circle, Hui o Hanamaulu, Kapaa, Eleele Homes, Kalaheo Homes, Punahale Homes, and Koolau Village. David Malo Circle, although it can be considered the work of a master and possesses distinctive double pitched hipped roofs, has had a number of alterations in addition to the application of T-111 to its exterior walls, windows and doors replacement. On the interior, the kitchens and bathrooms have been remodeled, all interior doors are non-historic, and the bedroom closets have no doors.

Although a good example of the newly emerging policy directions of the HHA, with its residential-appearing duplexes, the buildings no longer retain their integrity of materials, design or workmanship. The twelve buildings, although retaining their massing and integrity of location, have been extensively remodeled.

David Malo Circle does not appear to meet the criteria for listing in the National Register of Historic Places.



APPENDIX E
ESA Section 7 and EFH Consultation

From: [Ty Shiramizu](#)
To: pifwo_admin@fws.gov
Cc: [Ronald Sato](#); [Izumi, Lisa M](#)
Subject: Informal Section 7 Consultation - HPHA Demolition of David Malo Circle and Pi'ilani Homes
Date: Wednesday, December 4, 2024 2:44:34 PM
Attachments: [HPHA Maui Demo Section 7 NLAA Determination Package.pdf](#)

Aloha Mr. Campbell,

We are initiating this Informal Section 7 Consultation on behalf of the Hawai'i Public Housing Authority (HPHA) for the proposed demolition of two public housing sites, David Malo Circle and Pi'ilani Homes in Lāhainā, Maui, Hawai'i. David Malo Circle is located at 723 Mill St., TMK (2) 4-6-010:028, and Pi'ilani Homes is located at 1028 Waine'e Street, TMK (2) 4-5-007:005. The proposed project involves the demolition and removal of remaining buildings and accessory structures as well as soil testing and removal to ensure that no hazardous materials remain. Both sites have been severely damaged by the wildfires which occurred in August 2023. All existing buildings at David Malo Circle were destroyed and several buildings at Pi'ilani Homes were destroyed. The proposed project would implement methods similar to those used by the U.S. Army Corps of Engineers (USACE), the U.S. Environmental Protection Agency (EPA), and other State and County Agencies to remove debris and contaminated soil and stabilize the sites.

We have consulted the USFWS' online IPaC resource to gather information about potential listed species that may occur at both sites and are proposing a "not likely to adversely affect" / "no effect" on the listed species. Please find the Informal Consultation Request letter with project information attached. Your concurrence or any comments you have on the subject project and proposed determination within 30 days of receipt of this letter would be greatly appreciated. Please don't hesitate to contact us if you have any questions.

Mahalo,

Ty Shiramizu, AICP

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JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



HAKIM OUANSAFI
EXECUTIVE DIRECTOR

BARBARA E. ARASHIRO
EXECUTIVE ASSISTANT

STATE OF HAWAII
KA MOKU'ĀINA O HAWAI'I
HAWAII PUBLIC HOUSING AUTHORITY

1002 NORTH SCHOOL STREET
POST OFFICE BOX 17907
HONOLULU, HAWAII 96817

IN REPLY PLEASE REFER TO:

24CMS095

November 25, 2024

Mr. Earl Campbell, Project Leader
Pacific Island Fish and Wildlife Office
U.S. Fish and Wildlife Service
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850

Email: pifwo_admin@fws.gov

Dear Mr. Campbell:

**Subject: Section 7, Endangered Species Act
Informal Consultation Request for Concurrence on Effect Determination for
Demolition of David Malo Circle and Pi'ilani Homes (Island of Maui)
HPHA Job No. 24-010-000**

The Hawai'i Public Housing Authority (HPHA) is planning to undertake the demolition of two existing public housing properties on the island of Maui. The project is referred to as the "Demolition of David Malo Circle and Pi'ilani Homes (Island of Maui) Project." The proposed demolition work may use federal funding provided by the U.S. Department of Housing and Urban Development (HUD) and this action would therefore be subject to the Endangered Species Act, Section 7 consultation requirements. HPHA is therefore conducting informal Section 7 consultation as the authorized Certifying Officer.

The proposed project involves the demolition and removal of debris from the remaining structures of both the David Malo Circle (18 units) and Pi'ilani Homes (42 units) housing sites located in Lāhainā, Maui, Hawai'i. These public housing structures were heavily damaged from the wildfire natural disaster that impacted the town of the Lāhainā in August 2023 (Lāhainā Wildfire). All existing buildings at the David Malo Circle site were destroyed but remaining accessory structures need to be demolished and removed. The Pi'ilani Homes site had several buildings destroyed, but five buildings remain, and the site is presently not used for low-income housing. Enclosure A includes a location map, before-and-after aerial photos of these housing sites, and site photos of current conditions at these properties.

Hence, the proposed action to demolish and remove what remains of these structures to allow for the future redevelopment of these sites. HPHA is still evaluating reconstruction to replace the total 60 units lost or redevelopment options for these sites, therefore, there are no plans established for these housing sites at this time. The intent of the proposed action is to prepare both properties for the future reconstruction or redevelopment of the housing units that were lost to the fires.

In a request to the U.S. Fish and Wildlife Service (USFWS) via the online Information for Planning and Consultation (IPaC) conducted on May 24, 2024, the service identified the potential presence of 17 total species among both housing sites and no critical habitats within either project site. Therefore, we are now conducting informal consultation seeking concurrence from your agency that this proposed action will have: 1) no effect on certain species; and 2) may affect but is not likely to adversely affect several species identified below.

No Effect on Species

1. Endangered Hawaiian Hoary Bat (*Lasiurus cinereus semotus*).
2. Endangered Hawksbill Sea Turtle (*Eretmochelys imbricata*).
3. Endangered Blackburn's Sphinx Moth (*Manduca blackburni*).
4. The threatened Newell's shearwater (*Puffinus auricularis newelli*), endangered Hawai'i Distinct Population Segment of Band-Rumped Storm Petrel (*Oceanodroma castro*), and the endangered Hawaiian petrel (*Pterodroma sandwichensis*), collectively referred to as Hawaiian seabirds.
5. Various flowering plants that include the endangered 'ena'ena (*Pseudognaphalium sandwicense*), endangered Awiwi (*Schenkia sebaeoides*), endangered Carter's Panicgrass (*Panicum fauriei* var. *carteri*), endangered Dwarf Naupaka (*Scaevola coriacea*), endangered Ihi (*Portulaca villosa*), endangered Ohai (*Sesbania tomentosa*), and endangered Round-leaved Chaff-flower (*Achyranthes splendens* var. *rotundata*).

Not Likely to Adversely Affect These Species

1. The endangered Hawaiian Coot (*Fulica alai*), endangered Hawaiian Common Gallinule (*Gallinula galeata sandwicensis*), endangered Hawaiian Duck (*Anas wyvilliana*), and endangered Hawaiian stilt (*Himantopus mexicanus knudseni*) that are collectively referred to as Hawaiian waterbirds.
2. Threatened Hawaiian Goose, or Nēnē (*Branta sandwicensis*).

Description of the Proposed Action

The proposed action consists of the demolition and removal of remaining buildings and accessory structures (light poles, trash enclosures, mailbox, etc.) at the Pi'ilani Homes site and the demolition and removal of similar accessory structures remaining at the David Malo Circle housing site. In addition, HPHA would clear remaining undeveloped areas (grassed areas) to remove potential ash and debris, take soil samples, remove soil layers until no hazardous materials are present, and then install gravel to stabilize the sites and prevent erosion. The USACE is assisting with clean up and recovery efforts in Maui

following the Lāhainā Wildfires. These methods were used by the USACE to remove debris and hazardous materials associated with buildings or other structures destroyed by wildfire. Demolished material will be dampened and placed in a truck before being wrapped in industrial plastic for transport to the temporary debris site established for this effort.

FWS Information for Planning and Consultation

The USFWS IPaC website was used to input information for each of the project site locations to identify potential listed endangered and threatened species that may be present within the project area that should be considered. These species lists were used to evaluate project effects and identify measures to avoid or minimize effects. Enclosure B includes this species list generated, and Table 1 provides a summary of species identified.

Table 1 – Summary Listing of Species from IPaC		
Common Name	Scientific Name	Status
Mammals		
Hawaiian Hoary Bat, Opeapea	<i>Lasiurus cinereus semotus</i>	Endangered
Birds		
Band-Rumped Storm-Petrel	<i>Hydrobates castro</i>	Endangered
Hawaiian Goose	<i>Branta sandvicensis</i>	Threatened
Hawaiian Coot (Keokeo)	<i>Fulica alai</i>	Endangered
Hawaiian Duck (Koloa)	<i>Anas wyvilliana</i>	Endangered
Hawaiian Stilt	<i>Himantopus mexicanus knudseni</i>	Endangered
Newell's Shearwater	<i>Puffinus auricularis newelli</i>	Threatened
Hawaiian Petrel	<i>Pterodroma sandwichensis</i>	Endangered
Reptiles		
Hawksbill Sea Turtle	<i>Eretmochelys imbricata</i>	Endangered
Insects		
Blackburn's Sphinx Moth	<i>Manduca blackburni</i>	Endangered
Flowering Plants		
Awiwi	<i>Schenkia sebaeoides</i>	Endangered
Carter's Panicgrass	<i>Panicum fauriei var. carteri</i>	Endangered
Dwarf Naupaka	<i>Scaevola coriacea</i>	Endangered
'Ena'ena	<i>Pseudognaphalium sandwicense var. molokaiense</i>	Endangered
Ihi	<i>Portulaca villosa</i>	Endangered
Ohai	<i>Sesbania tomentosa</i>	Endangered
Round-leaved Chaff-flower	<i>Achranthes splendens var. rotundata</i>	Endangered

Consequences of the Proposed Action

No Effect on Listed Species

The proposed demolition work of remaining structures at these two housing sites should have no effect on the following species because they are unlikely to be present within the area of potential effect or this action would not impact their habitat.

1. Endangered Hawaiian Hoary Bat (*Lasiurus cinereus semotus*).

The Hawaiian hoary bat, opeapea, roosts in both exotic and native woody vegetation across all islands and will leave young unattended in trees and shrubs when they forage. If trees or shrubs 15 feet or taller are cleared during the pupping season (June 1 through September 15), there is a risk that young bats could inadvertently be harmed or killed since they are too young to fly or may not move away from disturbance.

No trees or shrubs 15 feet or taller remain on these two housing sites as all prior vegetation has been destroyed by the wildfire. Current vegetation growing consists of invasive shrubs and grasses. A lone tree at David Malo Circle was destroyed by the fire and has since been removed as part of the USACE's debris removal effort.

2. Endangered Hawksbill Sea Turtle (*Eretmochelys imbricata*).

Hawksbill sea turtles exhibit a wide tolerance for nesting substrate (ranging from sandy beach to crushed coral) with nests typically placed under vegetation. This species exhibits strong nesting site fidelity. Nesting occurs on Hawai'i's beaches from May through September, peaking in June and July, with hatchlings emerging through November and December.

The two housing sites are not located near the shoreline as shown on the Location Map (Enclosure A) where the Hawksbill Sea Turtle could reasonably be present or access. The housing sites are located along Honoapi'ilani Highway within a formerly highly developed area of Lahaina town and there are no waterways near these sites for the Hawksbill Sea Turtle to nest or be present.

3. Hawaiian Seabirds.

The threatened Newell's shearwater (*Puffinus auricularis newelli*), endangered Hawai'i Distinct Population Segment of Band-Rumped Storm Petrel (*Oceanodroma castro*), and the endangered Hawaiian petrel (*Pterodroma sandwichensis*) are collectively referred to as Hawaiian seabirds. These species may fly through the project area at night during the breeding, nesting, and fledging seasons (March 1st to December 15th). They are attracted to lights and after circling the lights they may become exhausted or disoriented,

causing them to ground. Downed seabirds are subject to injury or death due to collision with automobiles, starvation, and predation. Young birds flying through the project area between September 15th and December 15th, in their first flights from their nests to the ocean, are particularly vulnerable to light attraction.

HPHA does not plan to conduct demolition activities for these two housing projects at night. Therefore, such demolition activities would not require using temporary outdoor lighting or the permanent installation of outside lights. Therefore, these demolition activities occurring during the day would have no negative impact on Hawaiian seabirds.

4. Blackburn's Sphinx Moth (*Manduca blackburni*).

Historical records indicate that Blackburn's sphinx moth mostly occurred in coastal, lowland, and dry forests in areas receiving less than 50 inches of rain per year. Human modification of Hawaiian landscapes has greatly reduced these communities. Some common native plants where the species occurs include lama (*Diospyros sandwicensis*), 'ohe (*Reynoldsia sandwicensis*), hao (*Raovolfia sandwicensis*), 'āla'a (*Pouteria sandwicensis*), āulu (*Pisonia sandwicensis* and its varieties), 'a'ali'i (*Dodonaea viscosa*), naio (*Myoporum sandwicense*), and wiliwili (*Erythrina sandwicensis*). The populations on Maui are primarily associated with 'aiea (*Nothocestrum* spp.) trees. Perhaps the largest stand of 'aiea trees in the State are located on Maui in the Kanaio Natural Area Reserve. Historically, habitat loss and degradation due to ranching, introduced plants and animals, human development, and wildfire reduced the quantity and quality of native habitats. Current threats include non-native ants, especially the big-headed ant (*Linepithema humile*) and several species of parasitic flies and wasps.

The common native plants identified where the species occurs are not present on the two housing sites, and all prior vegetation has been destroyed by the Lahaina Wildfire. Current vegetation growing consists of invasive shrubs and grasses. Therefore, there should be no host plants present on the site and demolition activities should not affect this species.

5. Endangered flowering plants identified in Table 1.

There were several flowering plants identified by IPaC for the region where the two housing sites are located. However, these sites do not overlap with any identified critical habitat areas for each of these species based upon IPaC.

These endangered plants were not known to be previously present at these housing sites, and the Lahaina Wildfire destroyed all prior vegetation existing. There were also no known original native vegetation present at these housing sites prior to the wildfire as vegetation consisted mainly of lawn and other landscaped plants used as part of their initial development.

Not Likely to Adversely Affect Listed Species

The proposed demolition work of remaining structures at these two housing sites is not likely to adversely affect the following species because they are unlikely to be present within the area of potential effect, or this action should have minimal impact on their habitat, and avoidance and minimization measures proposed would ensure they are not negatively impacted.

1. Hawaiian Waterbirds.

The endangered Hawaiian Coot (*Fulica alai*), endangered Hawaiian Duck (*Anas wyvilliana*), and endangered Hawaiian stilt (*Himantopus mexicanus knudseni*) are collectively referred to as Hawaiian waterbirds. Hawaiian waterbirds are found in a variety of wetland habitats including freshwater marshes and ponds, coastal inlets, artificial reservoirs, irrigation ditches, and sewage treatment ponds. Hawaiian stilts may also be found wherever temporary or persistent standing water occurs. Threats to these species include predation by non-native mammals and birds, and habitat loss. The creation of standing or open water may result in the attraction of Hawaiian waterbirds to a site. Additionally, the Hawaiian stilt is known to nest in sub-optimal locations if water is present. Loud noise caused by an action could potentially disturb these species, especially if they are nesting close to the project site.

The demolition of remaining structures at these two housing sites should not adversely impact Hawaiian waterbirds. There are no existing wetland habitats or natural water sources within the housing sites or in their immediate vicinity that may serve as habitat for nesting or foraging for these waterbirds. These housing sites are situated along the highway and within a previously urban area of Lahaina town. Demolition activities should similarly not create standing or open water that may attract Hawaiian waterbirds. Best management practices would be incorporated into demolition plans to minimize the creation of such open water.

The following minimization measures would be implemented if a nest or active brood is found on the site.

- a. HPHA will contact the FWS within 48 hours for guidance.
- b. HPHA will maintain a 100-foot buffer around all active nests or broods until the chicks are able to fly (fledge). Any potentially disruptive actions will not take place within this buffer.
- c. HPHA will have a qualified biologist monitor to ensure actions do not lead to adverse consequences.

2. Threatened Hawaiian (Nēnē) Goose (*Branta sandvicensi*)

Nēnē are found on the islands of Hawai'i, Maui, Moloka'i, and Kaua'i and are observed in a variety of habitats. They prefer open areas such as pastures, golf courses, wetlands, natural grasslands, shrublands, and lava flows. Threats to

the species include predation from introduced mammalian and avian predators, wind facilities, and vehicles.

The demolition of remaining structures at these two housing sites should not adversely impact the endangered Nēnē. There are no existing wetland habitats or natural water sources within the housing sites or in their immediate vicinity that may serve as habitat for nesting or foraging for this species. These housing sites are situated along the highway and within a previously urban area of Lahaina town.

To avoid and minimize potential project impacts to Nēnē, the following measures will be implemented if they are present on the project sites:

- a. Nēnē will not be approached, fed, or disturbed.
- b. If Nēnē are observed within the project area during the breeding season (September through April), a biologist familiar with Nēnē nesting behavior will survey for nests in and around the project area prior to the resumption of any work and repeat surveys will take place after any subsequent delay of work of 3 or more days (during which the birds may attempt to nest).
- c. All work will be ceased immediately and the USFWS will be contacted for further guidance if a nest is discovered within a radius of 150 feet of the project site, or a previously undiscovered nest is found within the 150-foot radius after work begins.

Proposed Determination

We believe that the potential for significant effects occurring to listed species are unlikely to occur due to the location of these two housing sites, these sites not being designated as critical habitats, the absence of suitable nesting or foraging habitat, previous development of these housing projects and other land uses in the immediate area, and due to the damages resulting from the Lahaina Wildfire.

Therefore, we believe the demolition of remaining structures at these two housing sites would have “no effect” on the endangered Hawaiian Hoary Bat, Hawksbill Sea Turtle, Blackburn’s Sphinx Moth, Hawaiian Band-Rumped Storm Petrel, Hawaiian petrel and identified flower plants. The proposed action would also have “no effect” on the threatened Newell’s shearwater.

Because effects from the proposed action should be discountable, we are seeking your agency’s concurrence that the proposed action may affect but is “not likely to adversely affect” the Hawaiian Coot, Hawaiian Common Gallinule, Hawaiian Stilt, and Hawaiian Duck. The proposed action is also “not likely to adversely affect” the threatened Hawaiian Goose. Conservation and minimization measures identified would further ensure these species are not impacted and are based upon the information provided through the USFWS IPaC.

Mr. Earl Campbell
November 25, 2024
Page 8

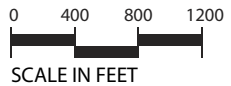
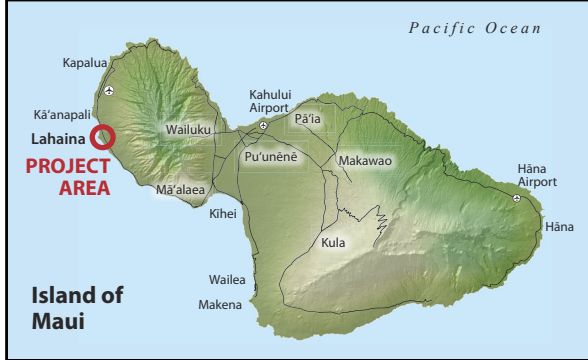
We respectfully request your response within 30 days of receipt of this letter. Should you have any questions or require additional information, please contact Ms. Becky L. Choi, State Housing Development Administrator at (808) 832-6020.

Sincerely,



Hakim Ouansafi
Executive Director

Attachment: Enclosure A – Project Location Map, photos
Enclosure B – IPaC species lists



LOCATION MAP

March 2023



August 2023



March 2023



November 2023

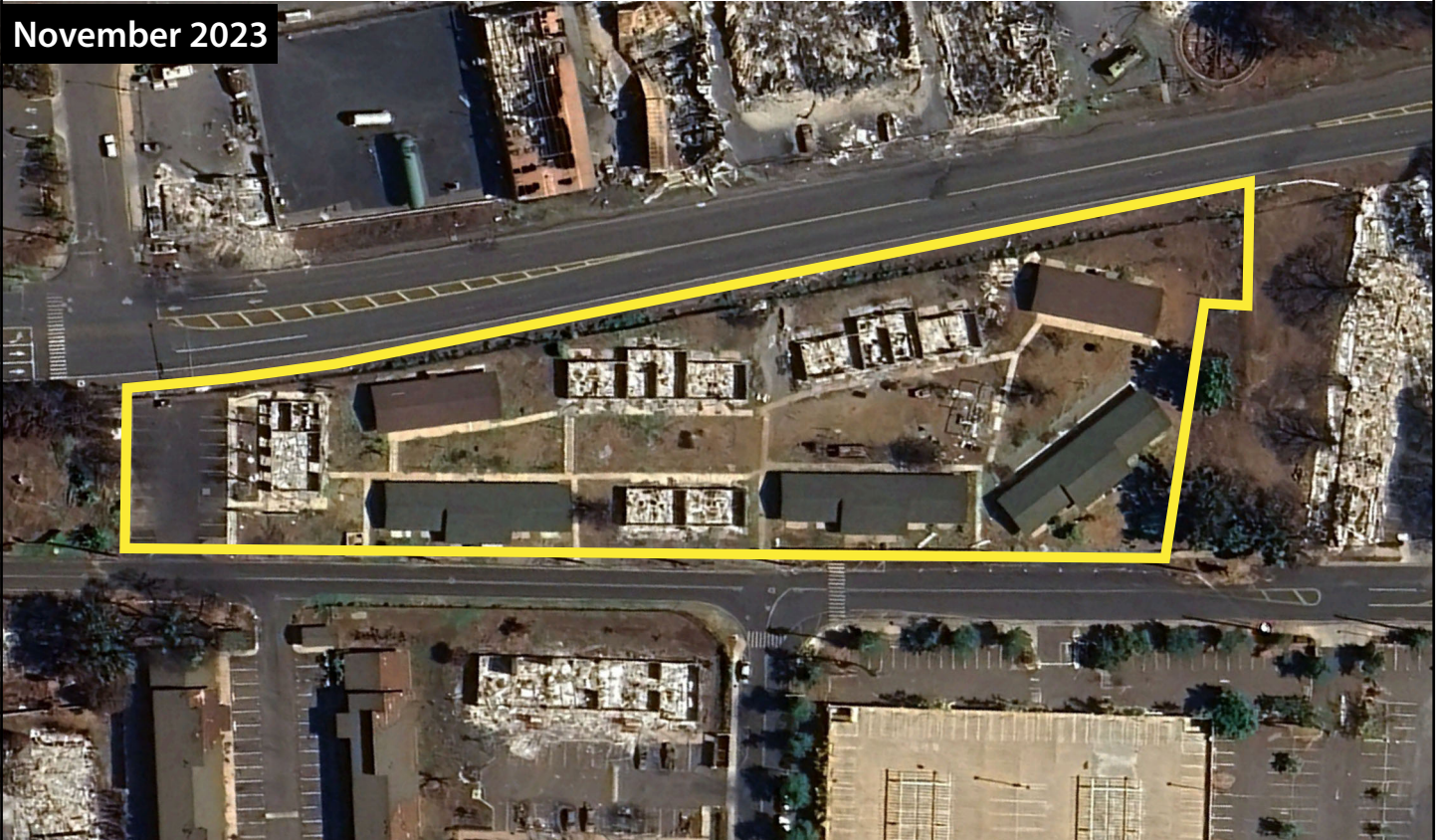




Photo 01. View of David Malo Circle Housing Site



Photo 02. View of David Malo Circle Housing Site



Photo 03. View of Piilani Homes Site Cleared by USACE



Photo 04. View of Area Between Two Remaining Buildings At Piilani Homes



Photo 05. View of Cleared Areas for Former Buildings at Piilani Homes



Photo 06. View of Piilani Homes Site



Note: Photos Shown Are Taken in September 2024

Photos of Existing Conditions



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Pacific Islands Fish And Wildlife Office
300 Ala Moana Boulevard, Box 50088
Honolulu, HI 96850-5000
Phone: (808) 792-9400 Fax: (808) 792-9580

In Reply Refer To:
Project Code: 2024-0095318
Project Name: David Malo Homes

05/24/2024 03:05:05 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened and endangered species, as well as designated critical habitat that may occur within the boundary of your proposed project and that may be affected by project related actions. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). Please contact the Service's Pacific Islands Fish and Wildlife Office (PIFWO) at 808-792-9400 if you have any questions regarding your IPaC species list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may adversely affect threatened and endangered species and/or designated critical habitat.

Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a Biological

Evaluation, similar to a Biological Assessment, be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment or Biological Evaluation are described at 50 CFR 402.12.

Due to the significant number of listed species found on each island within PIFWO's regulatory jurisdiction, and the difficulty in accurately mapping ranges for species that we have limited information about, your species list may include more species than if you obtained the list directly from a Service biologist. We recommend you use the species links in IPaC to view the life history, habitat descriptions, and recommended avoidance and minimization measures to assist with your initial determination of whether the species or its habitat may occur within your project area. If appropriate habitat is present for a listed species, we recommend surveys be conducted to determine whether the species is also present. If no surveys are conducted, we err on the side of the species, by regulation, and assume the habitat is occupied. Updated avoidance and minimization measures for plants and animals, best management practices for work in or near aquatic environments, and invasive species biosecurity protocols can be found on the PIFWO website at: <https://www.fws.gov/office/pacific-islands-fish-and-wildlife/library>.

If a Federal agency determines, based on the Biological Assessment or Biological Evaluation, that a listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at: <http://www.fws.gov/endangered/esa-library/index>.

Non-federal entities can also use the IPaC generated species list to develop Habitat Conservation Plans (HCP) in accordance with section 10(a)(1)(B) of the Act. We recommend HCP applicants coordinate with the Service early during the HCP development process. For additional information on HCPs, the Habitat Conservation Planning handbook can be found at <https://www.fws.gov/sites/default/files/documents/habitat-conservation-planning-handbook-entire.pdf>.

Please be aware that wind energy projects should follow the Service's wind energy guidelines (<http://www.fws.gov/windenergy>) for minimizing impacts to migratory birds. Listed birds and the Hawaiian hoary bat may also be affected by wind energy development and we recommend development of a Habitat Conservation Plan for those species, as described above. Guidance for minimizing impacts to migratory birds for projects including communications towers can be found at:

- <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers>
- <http://www.towerkill.com>
- <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow>

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation actions that benefit threatened and endangered species into their project planning to further the purposes of the Act in accordance with section 7(a)(1). Please include the Consultation Tracking Number associated with your IPaC species list in any

request for consultation or correspondence about your project that you submit to our office. Please feel free to contact us at PIFWO_admin@fws.gov or 808-792-9400 if you need more current information or assistance regarding the potential impacts to federally listed species and federally designated critical habitat.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Pacific Islands Fish And Wildlife Office
300 Ala Moana Boulevard, Box 50088
Honolulu, HI 96850-5000
(808) 792-9400

PROJECT SUMMARY

Project Code: 2024-0095318

Project Name: David Malo Homes

Project Type: Fire - Burned Area Emergency Rehabilitation (BAER)

Project Description: Demolition of remaining structures following the Lahaina Wildfire

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@20.876863,-156.67584103144108,14z>



Counties: Maui County, Hawaii

ENDANGERED SPECIES ACT SPECIES

There is a total of 17 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Hawaiian Hoary Bat <i>Lasiurus cinereus semotus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/770 General project design guidelines: https://ipac.ecosphere.fws.gov/project/MGTS734RP5BR7JXIORZN7F6A7A/documents/generated/6477.pdf	Endangered

BIRDS

NAME	STATUS
Band-rumped Storm-petrel <i>Hydrobates castro</i> Population: USA (HI) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1226 General project design guidelines: https://ipac.ecosphere.fws.gov/project/MGTS734RP5BR7JXIORZN7F6A7A/documents/generated/6939.pdf	Endangered
Hawaiian Coot (alae Ke`oke`o) <i>Fulica alai</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7233 General project design guidelines: https://ipac.ecosphere.fws.gov/project/MGTS734RP5BR7JXIORZN7F6A7A/documents/generated/6934.pdf	Endangered
Hawaiian Duck <i>Anas wyvilliana</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7712 General project design guidelines: https://ipac.ecosphere.fws.gov/project/MGTS734RP5BR7JXIORZN7F6A7A/documents/generated/6934.pdf	Endangered
Hawaiian Goose <i>Branta (=Nesochen) sandvicensis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1627 General project design guidelines: https://ipac.ecosphere.fws.gov/project/MGTS734RP5BR7JXIORZN7F6A7A/documents/generated/6925.pdf	Threatened
Hawaiian Petrel <i>Pterodroma sandwichensis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6746 General project design guidelines: https://ipac.ecosphere.fws.gov/project/MGTS734RP5BR7JXIORZN7F6A7A/documents/generated/6939.pdf	Endangered
Hawaiian Stilt <i>Himantopus mexicanus knudseni</i> No critical habitat has been designated for this species.	Endangered

NAME	STATUS
Species profile: https://ecos.fws.gov/ecp/species/2082 General project design guidelines: https://ipac.ecosphere.fws.gov/project/MGTS734RP5BR7JXIORZN7F6A7A/documents/generated/6934.pdf	
Newell's Shearwater <i>Puffinus newelli</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2048 General project design guidelines: https://ipac.ecosphere.fws.gov/project/MGTS734RP5BR7JXIORZN7F6A7A/documents/generated/6939.pdf	Threatened

REPTILES

NAME	STATUS
Hawksbill Sea Turtle <i>Eretmochelys imbricata</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3656	Endangered

INSECTS

NAME	STATUS
Blackburn's Sphinx Moth <i>Manduca blackburni</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4528 General project design guidelines: https://ipac.ecosphere.fws.gov/project/MGTS734RP5BR7JXIORZN7F6A7A/documents/generated/6926.pdf	Endangered

FLOWERING PLANTS

NAME	STATUS
`ena`ena <i>Pseudognaphalium sandwicensium</i> var. <i>molokaiense</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5993	Endangered
Awiwi <i>Schenkia sebaeoides</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7103	Endangered
Carter's Panicgrass <i>Panicum fauriei</i> var. <i>carteri</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5578	Endangered
Dwarf Naupaka <i>Scaevola coriacea</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4669	Endangered
Ihi <i>Portulaca villosa</i> No critical habitat has been designated for this species.	Endangered

NAME	STATUS
Species profile: https://ecos.fws.gov/ecp/species/4886	
Ohai <i>Sesbania tomentosa</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8453 General project design guidelines: https://ipac.ecosphere.fws.gov/project/MGTS734RP5BR7JXIORZN7F6A7A/documents/generated/7050.pdf	Endangered
Round-leaved Chaff-flower <i>Achyranthes splendens var. rotundata</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4709	Endangered

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act¹ and the Migratory Bird Treaty Act².

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats³, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "[Supplemental Information on Migratory Birds and Eagles](#)".

-
1. The [Bald and Golden Eagle Protection Act](#) of 1940.
 2. The [Migratory Birds Treaty Act](#) of 1918.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

THERE ARE NO BALD AND GOLDEN EAGLES WITHIN THE VICINITY OF YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats³ should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "[Supplemental Information on Migratory Birds and Eagles](#)".

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
'apapane <i>Himatione sanguinea</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/9659	Breeds Dec 1 to Jul 31
Black Noddy <i>Anous minutus melanogenys</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/10559	Breeds Apr 1 to Nov 30
Black-footed Albatross <i>Phoebastria nigripes</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/8033	Breeds Apr 1 to Aug 31
Buller's Shearwater <i>Ardenna bulleri</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/11939	Breeds elsewhere
Bulwer's Petrel <i>Bulweria bulwerii</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/10579	Breeds May 1 to Sep 30

NAME	BREEDING SEASON
Hawai'i 'amakihi <i>Chlorodrepanis virens</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/9655	Breeds Nov 15 to Aug 15
Maui 'alauahio <i>Paroreomyza montana</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/9663	Breeds Apr 15 to Aug 15
Red-tailed Tropicbird <i>Phaethon rubricauda melanorhynchos</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/10563	Breeds Dec 15 to Oct 15
Wandering Tattler <i>Tringa incana</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/11941	Breeds elsewhere

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

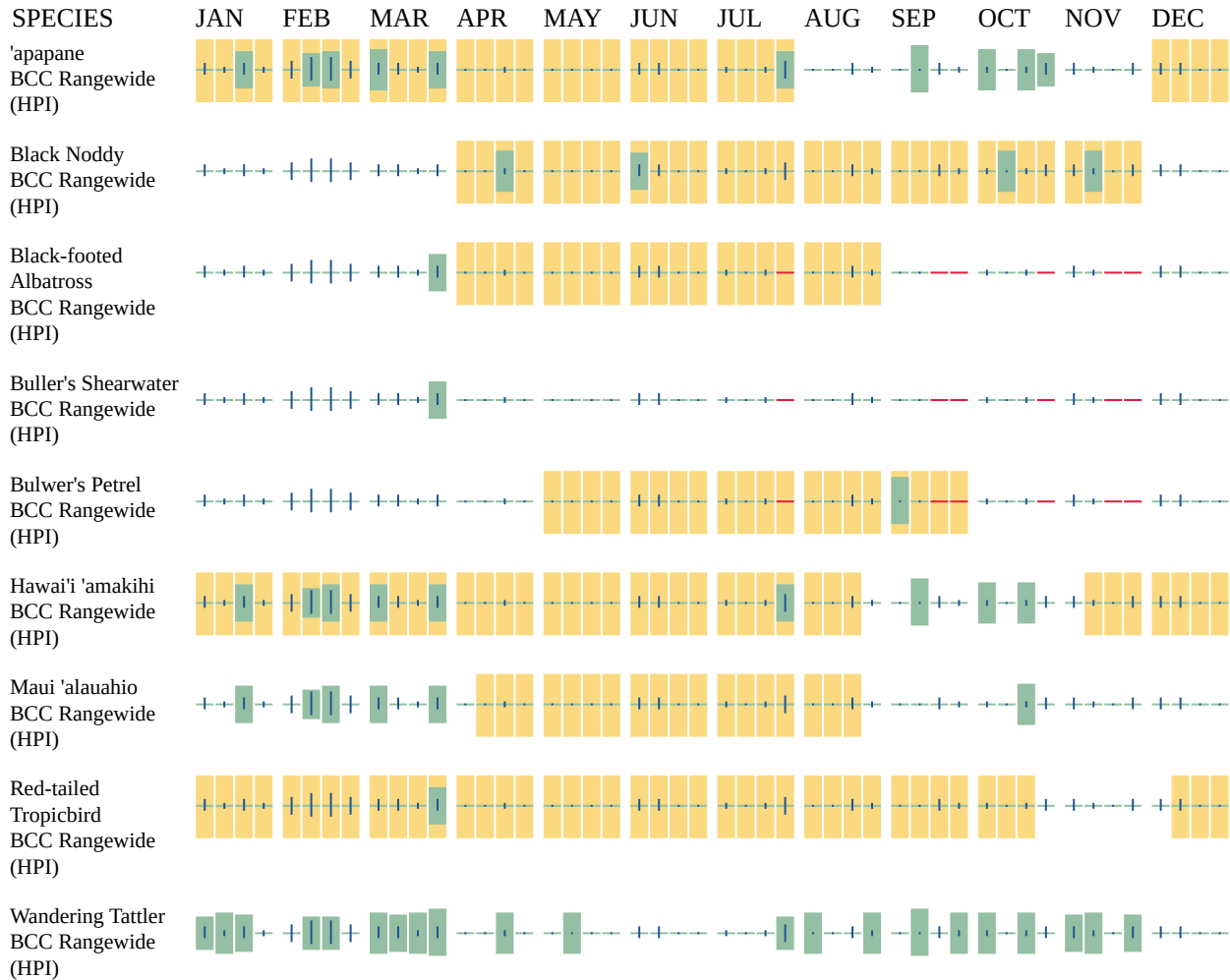
Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

■ probability of presence ■ breeding season | survey effort — no data



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: State of Hawaii
Name: Ty Shiramizu
Address: 2153 North King Street
City: Honolulu
State: HI
Zip: 96819
Email: tshiramizu@bowersandkubota.com
Phone: 8083467332

LEAD AGENCY CONTACT INFORMATION

Lead Agency: State of Hawaii



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Pacific Islands Fish And Wildlife Office
300 Ala Moana Boulevard, Box 50088
Honolulu, HI 96850-5000
Phone: (808) 792-9400 Fax: (808) 792-9580

In Reply Refer To:
Project Code: 2024-0095320
Project Name: Piilani Homes

05/24/2024 03:12:07 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened and endangered species, as well as designated critical habitat that may occur within the boundary of your proposed project and that may be affected by project related actions. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). Please contact the Service's Pacific Islands Fish and Wildlife Office (PIFWO) at 808-792-9400 if you have any questions regarding your IPaC species list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may adversely affect threatened and endangered species and/or designated critical habitat.

Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a Biological

Evaluation, similar to a Biological Assessment, be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment or Biological Evaluation are described at 50 CFR 402.12.

Due to the significant number of listed species found on each island within PIFWO's regulatory jurisdiction, and the difficulty in accurately mapping ranges for species that we have limited information about, your species list may include more species than if you obtained the list directly from a Service biologist. We recommend you use the species links in IPaC to view the life history, habitat descriptions, and recommended avoidance and minimization measures to assist with your initial determination of whether the species or its habitat may occur within your project area. If appropriate habitat is present for a listed species, we recommend surveys be conducted to determine whether the species is also present. If no surveys are conducted, we err on the side of the species, by regulation, and assume the habitat is occupied. Updated avoidance and minimization measures for plants and animals, best management practices for work in or near aquatic environments, and invasive species biosecurity protocols can be found on the PIFWO website at: <https://www.fws.gov/office/pacific-islands-fish-and-wildlife/library>.

If a Federal agency determines, based on the Biological Assessment or Biological Evaluation, that a listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at: <http://www.fws.gov/endangered/esa-library/index>.

Non-federal entities can also use the IPaC generated species list to develop Habitat Conservation Plans (HCP) in accordance with section 10(a)(1)(B) of the Act. We recommend HCP applicants coordinate with the Service early during the HCP development process. For additional information on HCPs, the Habitat Conservation Planning handbook can be found at <https://www.fws.gov/sites/default/files/documents/habitat-conservation-planning-handbook-entire.pdf>.

Please be aware that wind energy projects should follow the Service's wind energy guidelines (<http://www.fws.gov/windenergy>) for minimizing impacts to migratory birds. Listed birds and the Hawaiian hoary bat may also be affected by wind energy development and we recommend development of a Habitat Conservation Plan for those species, as described above. Guidance for minimizing impacts to migratory birds for projects including communications towers can be found at:

- <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers>
- <http://www.towerkill.com>
- <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow>

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation actions that benefit threatened and endangered species into their project planning to further the purposes of the Act in accordance with section 7(a)(1). Please include the Consultation Tracking Number associated with your IPaC species list in any

request for consultation or correspondence about your project that you submit to our office. Please feel free to contact us at PIFWO_admin@fws.gov or 808-792-9400 if you need more current information or assistance regarding the potential impacts to federally listed species and federally designated critical habitat.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Pacific Islands Fish And Wildlife Office
300 Ala Moana Boulevard, Box 50088
Honolulu, HI 96850-5000
(808) 792-9400

PROJECT SUMMARY

Project Code: 2024-0095320

Project Name: Piilani Homes

Project Type: Fire - Burned Area Emergency Rehabilitation (BAER)

Project Description: Demolition of remaining structures following Lahaina Wildfire

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@20.8805449,-156.68049798045348,14z>



Counties: Maui County, Hawaii

ENDANGERED SPECIES ACT SPECIES

There is a total of 16 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Hawaiian Hoary Bat <i>Lasiurus cinereus semotus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/770 General project design guidelines: https://ipac.ecosphere.fws.gov/project/EXZTOQNMABGH5DQHFSH5TDS2YA/documents/generated/6477.pdf	Endangered

BIRDS

NAME	STATUS
Band-rumped Storm-petrel <i>Hydrobates castro</i> Population: USA (HI) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1226 General project design guidelines: https://ipac.ecosphere.fws.gov/project/EXZTOQNMABGH5DQHFSH5TDS2YA/documents/generated/6939.pdf	Endangered
Hawaiian Coot (alae Ke`oke`o) <i>Fulica alai</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7233 General project design guidelines: https://ipac.ecosphere.fws.gov/project/EXZTOQNMABGH5DQHFSH5TDS2YA/documents/generated/6934.pdf	Endangered
Hawaiian Duck <i>Anas wyvilliana</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7712 General project design guidelines: https://ipac.ecosphere.fws.gov/project/EXZTOQNMABGH5DQHFSH5TDS2YA/documents/generated/6934.pdf	Endangered
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Hawaiian Petrel <i>Pterodroma sandwichensis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6746 General project design guidelines: https://ipac.ecosphere.fws.gov/project/EXZTOQNMABGH5DQHFSH5TDS2YA/documents/generated/6939.pdf	Endangered
Hawaiian Stilt <i>Himantopus mexicanus knudseni</i> No critical habitat has been designated for this species.	Endangered

NAME	STATUS
Species profile: https://ecos.fws.gov/ecp/species/2082 General project design guidelines: https://ipac.ecosphere.fws.gov/project/EXZTOQNMABGH5DQHFSH5TDS2YA/documents/generated/6934.pdf	
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REPTILES

NAME	STATUS
Hawksbill Sea Turtle <i>Eretmochelys imbricata</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3656	Endangered

INSECTS

NAME	STATUS
Blackburn's Sphinx Moth <i>Manduca blackburni</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4528 General project design guidelines: https://ipac.ecosphere.fws.gov/project/EXZTOQNMABGH5DQHFSH5TDS2YA/documents/generated/6926.pdf	Endangered

FLOWERING PLANTS

NAME	STATUS
`ena`ena <i>Pseudognaphalium sandwicense</i> var. <i>molokaiense</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5993	Endangered
Carter's Panicgrass <i>Panicum fauriei</i> var. <i>carteri</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5578	Endangered
Dwarf Naupaka <i>Scaevola coriacea</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4669	Endangered
Ihi <i>Portulaca villosa</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4886	Endangered
Ohai <i>Sesbania tomentosa</i> There is final critical habitat for this species. Your location does not overlap the critical habitat.	Endangered

NAME	STATUS
Species profile: https://ecos.fws.gov/ecp/species/8453 General project design guidelines: https://ipac.ecosphere.fws.gov/project/EXZTOQNMABGH5DQHFSH5TDS2YA/documents/generated/7050.pdf	
Round-leaved Chaff-flower <i>Achyranthes splendens</i> var. <i>rotundata</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4709	Endangered

CRITICAL HABITATS

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1. The [Bald and Golden Eagle Protection Act](#) of 1940.
 2. The [Migratory Birds Treaty Act](#) of 1918.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

THERE ARE NO BALD AND GOLDEN EAGLES WITHIN THE VICINITY OF YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats³ should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "[Supplemental Information on Migratory Birds and Eagles](#)".

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
'apapane <i>Himatione sanguinea</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/9659	Breeds Dec 1 to Jul 31
Black Noddy <i>Anous minutus melanogenys</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/10559	Breeds Apr 1 to Nov 30
Black-footed Albatross <i>Phoebastria nigripes</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/8033	Breeds Apr 1 to Aug 31
Buller's Shearwater <i>Ardenna bulleri</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/11939	Breeds elsewhere
Bulwer's Petrel <i>Bulweria bulwerii</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/10579	Breeds May 1 to Sep 30

NAME	BREEDING SEASON
Hawai'i 'amakihi <i>Chlorodrepanis virens</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/9655	Breeds Nov 15 to Aug 15
Maui 'alauahio <i>Paroreomyza montana</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/9663	Breeds Apr 15 to Aug 15
Red Phalarope <i>Phalaropus fulicarius</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/10469	Breeds elsewhere
Red-tailed Tropicbird <i>Phaethon rubricauda melanorhynchos</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/10563	Breeds Dec 15 to Oct 15
Wandering Tattler <i>Tringa incana</i> This is a Bird of Conservation Concern (BCC) throughout its range in Hawaii and the Pacific Islands. https://ecos.fws.gov/ecp/species/11941	Breeds elsewhere

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: State of Hawaii
Name: Ty Shiramizu
Address: 2153 North King Street
City: Honolulu
State: HI
Zip: 96819
Email: tshiramizu@bowersandkubota.com
Phone: 8083467332

LEAD AGENCY CONTACT INFORMATION

Lead Agency: State of Hawaii

EFH Mapper Report

EFH Data Notice

Essential Fish Habitat (EFH) is defined by textual descriptions contained in the fishery management plans developed by the regional fishery management councils. In most cases mapping data can not fully represent the complexity of the habitats that make up EFH. This report should be used for general interest queries only and should not be interpreted as a definitive evaluation of EFH at this location. A location-specific evaluation of EFH for any official purposes must be performed by a regional expert. Please refer to the following links for the appropriate regional resources.

[Pacific Islands Regional Office](#)

EFH

No additional Essential Fish Habitats (EFH) were identified at the report location.

Pacific Salmon EFH

No Pacific Salmon Essential Fish Habitat (EFH) were identified at the report location.

Atlantic Salmon

No Atlantic Salmon were identified at the report location.

HAPCs

No Habitat Areas of Particular Concern (HAPC) were identified at the report location.

EFH Areas Protected from Fishing

No EFH Areas Protected from Fishing (EFHA) were identified at the report location.

Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data.

****For links to all EFH text descriptions see the complete data inventory: [open data inventory -->](#)**

Albacore - South Pacific,
Baker Island,
Bigeye Scad - Hawaiian Archipelago,
Black Coral - Au'Au Bed,
Black Marlin - Pacific,
CNMI Saipan,
Crustaceans,
Fagatele Bay,
Guam Cocos Lagoon,
Guam Haputo Point,
Guam Jade Shoals,
Guam Orote Point,
Guam Ritidian Point,
Hawaii All CRAMP sites,
Hawaii All long term research sites,
Hawaii Kawaihae Harbor-Old Kona Airport,
Hawaii Kealakekua,
Hawaii Lapakahi Bay,
Hawaii Pauko Bay & Reef,
Hawaii Waialea Bay,

Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data.

****For links to all EFH text descriptions see the complete data inventory: [open data inventory -->](#)**

Howard Island,
Indo-Pacific Blue Marlin - Pacific,
Jarvis Island,
Johnson Atoll,
Kauai,
Kaula Rock,
Kawakawa - Tropical Pacific,
Kingman Reef,
Kona Crab - Hawaiian Archipelago,
Lanai Five Needles,
Lanai Halope Bay,
Lanai Manele Bay,
Lobster Complex - Northwestern Hawaiian Islands,
Lobster Complex - other than Northwestern Hawaiian Islands,
Longfin Mako Shark - North Pacific,
Mackerel Scad - Hawaiian Archipelago,
Maui Ahihiki Kinau Natural Area Reserve,
Maui Honolua-Mokuleia Bay,
Maui Molokini,
Maui Olowalo Reef Area,
Molokai,
Moonfish (Opah) - Pacific,
Niihau,
NWHI FFS,
NWHI HAPC 1,
NWHI Laysan,
NWHI Midway,
Oahu Kaena Point,
Oahu Kahe Reef,
Oahu Kaneohe Bay,
Oahu Makapuu Head/Tide Pool Reef Area,
Oahu Pupukea,
Oahu Shark's Cove,
Oahu Waikiki,
Oceanic Whitetip Shark - Tropical Pacific,
Oilfish Family - Pacific,
Other Tuna Relatives - Tropical Pacific,
Palmyra Atoll,
Pelagics,
Pomfrets - Pacific,
Precious Coral-Auau Channel,
Precious Coral-Brooks Banks bed,
Precious Coral-Makapuu bed,
Precious Corals Multi-Species Complex - Conditional Beds,
Precious Corals Multi-Species Complex - Makapu'u Bed,
Precious Coral-Wespac bed,
Sailfish - Pacific,
Salmon Shark - North Pacific,
Samoa Aua Transect,
Samoa Aunuu Island,
Samoa Larsen Bay,

Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data.

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Samoa Pago Pago,
Samoa Rose Atoll,
Samoa South Coast Ofu,
Samoa Steps Point,
Samoa Tua Island,
Seamount Groundfish Complex - Hancock Seamount,
Shortbill Spearfish - Pacific,
Silky Shark - Tropical Pacific,
Skipjack Tuna - Central Western Pacific,
Striped Marlin - Central Western Pacific,
Yellowfin Tuna - Central Western Pacific,
Wake Atoll,
Wahoo - Pacific

EFH Mapper Report

EFH Data Notice

Essential Fish Habitat (EFH) is defined by textual descriptions contained in the fishery management plans developed by the regional fishery management councils. In most cases mapping data can not fully represent the complexity of the habitats that make up EFH. This report should be used for general interest queries only and should not be interpreted as a definitive evaluation of EFH at this location. A location-specific evaluation of EFH for any official purposes must be performed by a regional expert. Please refer to the following links for the appropriate regional resources.

[Pacific Islands Regional Office](#)

EFH

No additional Essential Fish Habitats (EFH) were identified at the report location.

Pacific Salmon EFH

No Pacific Salmon Essential Fish Habitat (EFH) were identified at the report location.

Atlantic Salmon

No Atlantic Salmon were identified at the report location.

HAPCs

No Habitat Areas of Particular Concern (HAPC) were identified at the report location.

EFH Areas Protected from Fishing

No EFH Areas Protected from Fishing (EFHA) were identified at the report location.

Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data.

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Guam Haputo Point,
Guam Jade Shoals,
Guam Orote Point,
Guam Ritidian Point,
Hawaii All CRAMP sites,
Hawaii All long term research sites,
Hawaii Kawaihae Harbor-Old Kona Airport,
Hawaii Kealakekua,
Hawaii Lapakahi Bay,
Hawaii Pauko Bay & Reef,
Hawaii Waialea Bay,

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Indo-Pacific Blue Marlin - Pacific,
Jarvis Island,
Johnson Atoll,
Kauai,
Kaula Rock,
Kawakawa - Tropical Pacific,
Kingman Reef,
Kona Crab - Hawaiian Archipelago,
Lanai Five Needles,
Lanai Halope Bay,
Lanai Manele Bay,
Lobster Complex - Northwestern Hawaiian Islands,
Lobster Complex - other than Northwestern Hawaiian Islands,
Longfin Mako Shark - North Pacific,
Mackerel Scad - Hawaiian Archipelago,
Maui Ahihiki Kinau Natural Area Reserve,
Maui Honolua-Mokuleia Bay,
Maui Molokini,
Maui Olowalo Reef Area,
Molokai,
Moonfish (Opah) - Pacific,
Niihau,
NWHI FFS,
NWHI HAPC 1,
NWHI Laysan,
NWHI Midway,
Oahu Kaena Point,
Oahu Kahe Reef,
Oahu Kaneohe Bay,
Oahu Makapuu Head/Tide Pool Reef Area,
Oahu Pupukea,
Oahu Shark's Cove,
Oahu Waikiki,
Oceanic Whitetip Shark - Tropical Pacific,
Oilfish Family - Pacific,
Other Tuna Relatives - Tropical Pacific,
Palmyra Atoll,
Pelagics,
Pomfrets - Pacific,
Precious Coral-Auau Channel,
Precious Coral-Brooks Banks bed,
Precious Coral-Makapuu bed,
Precious Corals Multi-Species Complex - Conditional Beds,
Precious Corals Multi-Species Complex - Makapu'u Bed,
Precious Coral-Wespac bed,
Sailfish - Pacific,
Salmon Shark - North Pacific,
Samoa Aua Transect,
Samoa Aunuu Island,
Samoa Larsen Bay,

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Samoa Rose Atoll,
Samoa South Coast Ofu,
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Shortbill Spearfish - Pacific,
Silky Shark - Tropical Pacific,
Skipjack Tuna - Central Western Pacific,
Striped Marlin - Central Western Pacific,
Yellowfin Tuna - Central Western Pacific,
Wake Atoll,
Wahoo - Pacific

EFH Mapper Report

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[Pacific Islands Regional Office](#)

Query Results





Degrees, Minutes, Seconds: Latitude = 20° 52' 34" N, Longitude = 157° 19' 6" W

Decimal Degrees: Latitude = 20.876, Longitude = -156.682

The query location intersects with spatial data representing EFH and/or HAPCs for the following species/management units.

EFH

Link	Data Caveats	Species/Management Unit	Lifestage(s) Found at Location	Management Council	FMP
		All Pelagic Fisheries	Eggs/Larval, Juvenile/Adult	Western Pacific	FEP for Pacific Pelagic Fisheries
		Amberjack / Black Jack / Sea Bass	Eggs, Post-Hatch	Western Pacific	Bottomfish and Seamount Groundfish
		Blue Stripe Snapper / Gray Jobfish	Eggs, Post-Hatch, Post-Settlement/Sub-Adult/Adult	Western Pacific	Bottomfish and Seamount Groundfish
		Giant Trevally	Eggs, Post-Hatch, Post-Settlement/Sub-Adult/Adult	Western Pacific	Bottomfish and Seamount Groundfish
		Kona Crab	Eggs/Larval, Juvenile/Adult	Western Pacific	Bottomfish and Seamount Groundfish
		Main Hawaiian Islands Coral Reef Ecosystem	ALL	Western Pacific	
		Pink Snapper	Eggs, Post-Hatch	Western Pacific	Bottomfish and Seamount Groundfish

Link	Data Caveats	Species/Management Unit	Lifestage(s) Found at Location	Management Council	FMP
		Red Snapper / Longtail Snapper / Yellowtail Snapper / Pink Snapper / Snapper	Eggs, Post-Hatch	Western Pacific	Bottomfish and Seamount Groundfish
		Silver Jaw Jobfish / Thicklip Trevally	Eggs, Post-Hatch	Western Pacific	Bottomfish and Seamount Groundfish

Pacific Salmon EFH

No Pacific Salmon Essential Fish Habitat (EFH) were identified at the report location.

Atlantic Salmon

No Atlantic Salmon were identified at the report location.

HAPCs

No Habitat Areas of Particular Concern (HAPC) were identified at the report location.

EFH Areas Protected from Fishing

No EFH Areas Protected from Fishing (EFHA) were identified at the report location.

Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data.

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 Baker Island,
 Bigeye Scad - Hawaiian Archipelago,
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 Black Marlin - Pacific,
 CNMI Saipan,
 Crustaceans,
 Fagatele Bay,
 Guam Cocos Lagoon,
 Guam Haputo Point,
 Guam Jade Shoals,
 Guam Orote Point,
 Guam Ritidian Point,
 Hawaii All CRAMP sites,
 Hawaii All long term research sites,
 Hawaii Kawaihae Harbor-Old Kona Airport,
 Hawaii Kealakekua,
 Hawaii Lapakahi Bay,
 Hawaii Pauko Bay & Reef,
 Hawaii Waialea Bay,
 Howard Island,
 Indo-Pacific Blue Marlin - Pacific,
 Jarvis Island,
 Johnson Atoll,
 Kauai,
 Kaula Rock,
 Kawakawa - Tropical Pacific,
 Kingman Reef,

Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data.

****For links to all EFH text descriptions see the complete data inventory: [open data inventory -->](#)**

Kona Crab - Hawaiian Archipelago,
Lanai Five Needles,
Lanai Halope Bay,
Lanai Manele Bay,
Lobster Complex - Northwestern Hawaiian Islands,
Lobster Complex - other than Northwestern Hawaiian Islands,
Longfin Mako Shark - North Pacific,
Mackerel Scad - Hawaiian Archipelago,
Maui Ahihiki Kinau Natural Area Reserve,
Maui Honolua-Mokuleia Bay,
Maui Molokini,
Maui Olowalo Reef Area,
Molokai,
Moonfish (Opah) - Pacific,
Niihau,
NWHI FFS,
NWHI HAPC 1,
NWHI Laysan,
NWHI Midway,
Oahu Kaena Point,
Oahu Kahe Reef,
Oahu Kaneohe Bay,
Oahu Makapuu Head/Tide Pool Reef Area,
Oahu Pupukea,
Oahu Shark's Cove,
Oahu Waikiki,
Oceanic Whitetip Shark - Tropical Pacific,
Oilfish Family - Pacific,
Other Tuna Relatives - Tropical Pacific,
Palmyra Atoll,
Pelagics,
Pomfrets - Pacific,
Precious Coral-Auau Channel,
Precious Coral-Brooks Banks bed,
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Precious Corals Multi-Species Complex - Makapu'u Bed,
Precious Coral-Wespac bed,
Sailfish - Pacific,
Salmon Shark - North Pacific,
Samoa Aua Transect,
Samoa Aunuu Island,
Samoa Larsen Bay,
Samoa Pago Pago,
Samoa Rose Atoll,
Samoa South Coast Ofu,
Samoa Steps Point,
Samoa Tua Island,
Seamount Groundfish Complex - Hancock Seamount,
Shortbill Spearfish - Pacific,
Silky Shark - Tropical Pacific,

Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data.

****For links to all EFH text descriptions see the complete data inventory: [open data inventory -->](#)**

Skipjack Tuna - Central Western Pacific,
Striped Marlin - Central Western Pacific,
Yellowfin Tuna - Central Western Pacific,
Wake Atoll,
Wahoo - Pacific



APPENDIX F
NHPA Section 106 Consultation

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD, STE 555
KAPOLEI, HAWAII 96707

December 18, 2024

Hakim Ouansafi, Executive Director
State of Hawai'i, Hawaii Public Housing Authority
1002 North School St.
P.O. Box 17907
Honolulu, Hawai'i 96817
c/o Becky Choi, State Housing Development Administrator
Becky.L.Choi@hawaii.gov

IN REPLY REFER TO:
Project No.: 2024PR01198
Doc. No.: 2412LS26
Archaeology, Architecture

Dear Mr. Ouansafi:

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review –
State of Hawai'i Public Housing Authority
Demolition of David Malo Circle and Pi'ilani Homes
Request for Concurrence with the Effect Determination
723 Mill St. and 1028 Waine'e St., Lāhainā – Demolition
Paunau Ahupua'a, Lāhainā District, Island of Maui
TMK: (2) 4-5-007:005 and (2) 4-6-010:028**

This letter provides the State Historic Preservation Division's (SHPD) review of the State of Hawai'i (Hawai'i), Hawai'i Public Housing Authority's (HPHA) project titled, *Demolition of David Malo Circle and Pi'ilani Homes*. The project is subject to historic preservation review in accordance with Section 106 of the NHPA. The SHPD received the initial submittal on October 9, 2024, and the most recent submission on December 16, 2024. SHPD received the following:

- [X] A letter from Bowers and Kubota dated October 4, 2024, initiating consultation with the State Historic Preservation Officer (SHPO);
- [X] A location map, a comparison of before and after photos of the two project areas;
- [X] A letter dated from Mason Architects, Inc. (MASON) dated September 20, 2024, summarizing the information from previously completed architectural surveys for the David Malo Circle and Pi'ilani Homes; and
- [X] A letter from HPHA (24:CMS/092) dated December 4, 2024, initiating consultation pursuant to Section 106 summarizing the project and requesting the State Historic Preservation Officer's (SHPO's) concurrence with a determination of *no adverse effect*, a summary of consultation efforts with Native Hawaiian Organizations (NHO), a location map, and a letter dated September 20, 2024 from MASON providing information to support the Section 106 Consultation, including before and after photos of the project area.

The proposed demolition work will be funded by the U.S. Department of Housing and Urban Development (HUD) and is therefore subject to NHPA Section 106 consultation requirements. It has been determined to be an undertaking as defined in 36 CFR 800.16(y). The federal area of potential effects (APE) includes the entire 1.56-acre David Malo Circle parcel owned by the State of Hawaii and the 2.45-acre Pi'ilani Homes parcel. The David Malo Circle project

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RYAN K.P. KANAKA'OLE
FIRST DEPUTY

CIARA W.K. KAHAHANE
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

is located at 723 Mill Street and consists of nine duplexes around a U-shaped roadway. The Pi'ilani Homes project is located at 1028 Waine'e Street and consists of 42 dwelling units throughout eight ground-level apartment buildings.

According to the submittal documents, the applicant proposes to demolish the David Malo Circle and Pi'ilani Homes development that was severely damaged by the Lāhainā wildfire on August 8, 2023. The scope of work will include demolishing the remaining five buildings at Hawai'i HPHA's Pi'ilani Homes development and the remaining debris from both project areas. According to MASON's letter dated December 4, 2024, a site visit to both properties conducted on September 2024 confirmed that all the buildings in the David Malo Circle were destroyed by the fire.

According to SHPD records, the project location areas are located within the boundary of the Lāhainā National Historic Landmark District (SIHP #50-50-03-03001; NR #19661015). According to the USDA soil survey (Foote et al. 1972), the soils are identified as Ewa silty clay loam, with 0–3% slopes (EaA).

Consultation efforts under Section 106 of the NHPA began on October 3 and October 8, 2024. No comments were received through the State Office of Planning and Sustainable Development Environmental Notice publication. However, a comment was received from the Historic Hawai'i Foundation (HHF). Both HHF and HPHA agreed to the following:

1. David Malo Circle and Pi'ilani Homes are no longer eligible for listing in the National Register of Historic Places due to the destruction caused by the wildfire.
2. Both housing sites are located within the boundary of the Lahaina NHL District.
3. The demolition will have no adverse effect on historic properties.
4. The demolition and ground disturbing work should comply with archaeological monitoring
5. Any redevelopment plans should be compatible and harmonious with the NHL character, as required by the Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties.
6. HHF has requested to be included as a consulting party if and when redevelopment plans are proposed.

The HPHA has determined that the proposed undertaking will result in *no adverse effects*. **The SHPO concurs.** The SHPD's concurrence is based on the defined APE and the most recent written scope of work received from the HPHA. Any deviations from the scope of work or the APE require that the Section 106 consultation process be reopened before the project can move forward. This is to consider the potential effects on historic properties that may result in revisions to the project scope or APE.

Additionally, the HPHA has agreed with HHF that the demolition and ground disturbing work should comply with archaeological monitoring. Therefore, **the SHPD concurs** with HHF and HPHA's request that **archaeological monitoring be conducted for identification purposes** in order to adequately identify if any archaeological historic properties are present, and if so, to determine potential impacts to them. If necessary, appropriate mitigation measures will be implemented.

Due to the urgency of the project initiation related to affected Lāhainā wildfire residents, the archaeological monitoring shall be conducted with the SHPD-approved stipulations provided in the Attachment.

SHPD requests the following:

1. Written notification via email and HICRIS at the start of archaeological monitoring. Within 30 days of completion of archaeological monitoring fieldwork, SHPD looks forward to receiving a brief archaeological monitoring letter report of findings as specified in HAR §13-282-3(f)(1).
2. **If no historic properties are identified**, SHPD looks forward to reviewing an archaeological end-of-fieldwork monitoring letter report of the findings for review and acceptance.
3. **If historic properties are identified**, SHPD looks forward to receipt of an archaeological monitoring report meeting the requirements of HAR §13-279-5 for review and acceptance.

Please submit the AMR along with its associated review fee, and any other project documents and correspondence to HICRIS Project No. 2024PR01198 using the Project Supplement option.

Please note that if compliance with Hawai'i Revised Statutes Chapter 6E historic preservation review is required it must be completed prior to starting the proposed project.

HPHA is the office of record for this undertaking. Please maintain a copy of this letter with your environmental review record.

Please contact Mary Kodama, Acting Architecture Branch Chief, at Mary.Kodama@hawaii.gov, for any matters involving architectural resources, and Susan A. Lebo, Archaeology Branch Chief, at Susan.A.Lebo@hawaii.gov, for any questions regarding this letter.

Aloha,



Jessica L. Puff
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Ty Shiramizu, tshiramizu@bowersandkubota.com
Ronald Sato, rsato@bowersandkubota.com
Jared Chang, jchang@bowersandkubota.com
Lisa Izumi, lisa.m.izumi@hawaii.gov
Annalise Shiraki, as@masonarch.com

Attachment

These Archaeological Monitoring Conventions have been prepared in accordance with Hawaii Administrative Rules (HAR) §13-279-4 governing standards for Archaeological Monitoring Plans (AMP). Specific monitoring provisions are provided below.

1. Archaeological monitoring will be conducted full-time on-site for all ground-disturbing activities throughout the project. If there is a request to switch to spot monitoring, it must be submitted in writing to SHPD. This request should include appropriate field documentation (including photos) and a rationale to support the change. Any modifications to the monitoring plan can only occur with prior written approval by the SHPD.
2. Archaeological monitoring will be conducted by an archaeologist who meets the qualifications of HAR §13-281-3 to be a Principal Investigator (PI) or by an archaeologist with a BA or graduate degree in archaeology or a related field, along with a minimum of 2 years of archaeology field experience in Hawaii. This individual will work under the supervision of a PI who will be responsible for conducting weekly or bi-weekly field visits throughout the project's duration.
3. The County of Maui archaeologist and SHPD staff will be able to conduct site visits with advance written approval.
4. At least one archaeological monitor will be assigned to each piece of moving equipment. If significant cultural deposits or features are identified and additional archaeological monitors are required, the PI will notify the County of Maui Archaeologist and SHPD.
5. The archaeological monitor shall provide a copy of the AMC to both the contractor and the landowner. Additionally, the monitor shall keep a copy of the AMC on-site during all archaeological monitoring fieldwork.
6. The archaeological PI and archaeological monitor shall conduct a pre-construction briefing with all construction personnel and the landowner. The purpose of this briefing is to ensure all parties are aware of the need for archaeological monitoring, the types of historic properties (archaeological, cultural, and/or

burial) that may be encountered, the archaeological provisions outlined in the AMC, and the responsibility of the construction team to ensure that no ground disturbing work is conducted without an archaeological monitor present. They must also understand the responsibilities and procedures to be followed by each party in the event that construction activities result in an inadvertent discovery of human remains and/or archaeological historic properties. Additionally, they will be informed that the removal of any artifacts or photography of human remains is prohibited. Lastly, the PI is responsible for informing all parties of Act 129 and providing each with a copy and review the consequences of failure to comply.

7. The PI and archaeological monitor are responsible for coordinating with the contractor, landowner, and SHPD. The archaeological monitor shall coordinate monitoring, sampling, and documentation activities with the safety officers for the contractors to ensure compliance with safety regulations and protective measures.
8. The PI or archaeological monitor is responsible for uploading to HICRIS Project No. 2024PR01198 copies of all field documentation, photographs, and email correspondence weekly.
9. The archaeological monitor shall ensure that all backhoe trench excavations involve the use of shallow lifts (10-15 cm max.) and short draws (1-2 m max.) to provide greater control and minimize impact on cultural deposits, features, or human remains, if present. Manual excavation will be utilized if cultural deposits or features or iwi are encountered.
10. GPS data shall be collected for all excavated trenches and units, site boundaries and, where appropriate, features. A GPS unit with sub-meter accuracy must be utilized. Site boundaries need to be recorded as a polygon, not as a single point.
11. If any potential cultural deposits, features, or archaeological sites are identified, the archaeological monitor has the authority to halt the work in the immediate area (up to 5 meters) to carry out appropriate identification and documentation. If the find is determined to be a potential historic property, the archaeological monitor will notify the County of Maui Archaeologist and the SHPD's Archaeology Branch Chief for identification, appropriate documentation, and assessments of site significance and integrity.
12. Archaeological documentation of cultural deposits, features, etc. will include recording their location using a sub-meter accurate GPS unit (to obtain point or polygon data as appropriate); plotting the location on a scaled site map; taking digital photographs with scale and north arrow, and where possible, in both plan view and profile; illustrating feature morphology in scaled plan view and profile drawings; recording dimensions (length, width, depth, etc.); screening at least a 25% sample of a cultural deposit [or other % as determined in consultation with SHPD] through a 1/8-inch wire mesh screen to identify potential small-fraction remains; screening a measured volume of pit fill matrix through a 1/8-inch wire mesh screen to facilitate identification of pit function; documenting in the field historic artifacts in large infilled pit features and fill layers, including digital photographs with scales, and descriptions of the range of artifact types and relative abundance of types; collecting all historic artifacts from cultural layers and pit features [unless a sampling strategy is agreed to by SHPD] to facilitate identification of function and age. Construction work will only continue in the area of the non-burial find when all documentation has been completed.
13. Stratigraphy will be recorded to provide an accurate sequence from the top to the base of the excavation. Soil descriptions will be completed using USDA soils terminology and attributes, as well as Munsell soil color charts or manuals. Photographs with scales and north arrows will be taken at all locations where stratigraphic profiles are recorded. According to SHPD directives, measured soil samples will be collected from cultural deposits and features. Their locations will be recorded on the site map using a hand-held GPS with submeter capability, and also on individual stratigraphic profiles. Soil samples will also be collected from each of the layers identified in the field as possible former A-horizons.
14. In the event that no significant historic properties are identified, representative soil profiles will be collected throughout the project area. Representative soil profiles will measure a minimum of 2 meters across (when possible) and their locations will be recorded using GPS data points and on a USGS topographic Quadrangle Map.

15. In the event that human remains (burial or isolated, displaced skeletal elements) are inadvertently encountered, all work in the immediate area of the find will cease, the area and human remains will be secured, and the archaeological monitor will immediately notify the contractor and landowner, notification via both phone and email, to the Maui Police Department, the County of Maui Archaeologist, SHPD (archaeologist and burial sites specialist staff), and the Maui/Lanai Island Burial Council geographic representative. Treatment of the human remains (including archaeological documentation and completion of SHPD Inadvertent Burial documentation) shall be in accordance with Hawaii Revised Statutes §6E-43.6, Hawaii Administrative Rules §13-300-40, and written SHPD directives. Work will resume in the area of the inadvertent find only following written SHPD approval.
16. All artifacts and samples collected during the project (excluding human remains) shall be transported to the archaeological firm's office/laboratory on Maui for analysis in accordance with HAR §13-279. None of the artifacts will be transported off the island. They will be cleaned, sorted, counted, weighed (metric), and analyzed (both qualitative and quantitative data), with all data recorded on standard laboratory forms. Midden samples will be minimally identified to major class (e.g., bivalve, gastropod mollusk, echinoderm, fish, bird, and mammal). Digital photographs with scales will be taken of a representative sample of the diagnostic artifacts. Tables and text discussing the artifact and sample results will be provided in the report, along with appropriate digital photographs.
17. Samples (wood charcoal, shell, non-human bone, kukui nut) identified as potentially suitable for dating from an undisturbed context (e.g., cultural layer, pit feature) shall be considered for radiocarbon dating in consultation with SHPD and the landowner. Prior to submittal, potential wood charcoal samples shall first be submitted to International Archaeological Research Institute, Inc. (IARII) for wood taxa identification. Only samples identified as short-lived endemic or Polynesian-introduced species will be selected for dating purposes.
18. All stratigraphic profiles and plan view maps of identified historic properties (e.g., sites, cultural layers, features) shall be drafted for presentation in the final report. Photographs of the project work, including overviews, and of individual profiles, cultural layers, and features shall also be included in the final report. Representative soil profiles (non-cultural) summaries, stratigraphy and their locations will be plotted on a USGS topographic map.
19. The archaeological firm that has been contracted to conduct the archaeological monitoring shall store all project documentation (including field notes, photographs, profiles, plan view drawings, laboratory data, etc.) in their office/lab on the island of Maui. Additionally, they shall store all collected artifacts and sample material until the final disposition of the artifacts and samples is determined in consultation with the SHPD and the landowner.
20. All historic properties, including burial and non-burial sites, that are identified and/or further documented during archaeological monitoring (such as cultural layers, pit features, and buried walls) must be assessed for site significance according to HAR §13- 284-6, Criteria a through e. This assessment, along with an appropriate recommendation for future mitigation must be included in the final report.
21. The archaeological PI is responsible for sending to SHPD a written notification via email and HICRIS at the start of archaeological monitoring. They are also responsible for ensuring that the County of Maui Archaeologist is also notified via email.
22. Lastly, the landowner and PI are responsible for ensuring compliance with Act 129.

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



HAKIM OUANSAFI
EXECUTIVE DIRECTOR

BARBARA E. ARASHIRO
EXECUTIVE ASSISTANT

STATE OF HAWAII
KA MOKU'ĀINA O HAWAI'I
HAWAII PUBLIC HOUSING AUTHORITY
1002 NORTH SCHOOL STREET
POST OFFICE BOX 17907
HONOLULU, HAWAII 96817

IN REPLY PLEASE REFER TO:

24:CMS/092

December 4, 2024

Ms. Dawn N.S. Chang
Chairperson and State Historic Preservation Officer
Department of Land and Natural Resources
State of Hawai'i
Kalanimoku Building
1151 Punchbowl Street
Honolulu, Hawai'i 96813

Email: DLNR Chair: dlnr@hawaii.gov
SHPD Administrator (HICRIS): jessica.puff@hawaii.gov

Subject: National Historic Preservation Act (NHPA) Section 106 Consultation
State Hawai'i Public Housing Authority's Demolition of David Malo Circle
and Pi'ilani Homes (Island of Maui)
Tax Map Keys: (2) 4-6-010:028 and (2) 4-5-007:005
723 Mill St. and 1028 Waine'e St., Lāhainā, Hawai'i, 96761

Dear Chairperson Chang:

The State of Hawai'i (State), Hawai'i Public Housing Authority (HPHA) is initiating Section 106 consultation under the National Historic Preservation Act (NHPA) of 1966, as amended (2006) for the proposed Demolition of David Malo Circle and Pi'ilani Homes Project. These housing projects are located in Lāhainā, Maui, Hawai'i and were severely damaged by the Lāhainā Wildfire in August 2023. The proposed project may use federal funding provided by the U.S. Department of Housing and Urban Development (HUD) and HPHA is therefore conducting NHPA Section 106 consultation requirements as the authorized Certifying Officer. HPHA is requesting the State Historic Preservation Officer's (SHPO) concurrence that the demolition of remaining structures at these housing projects would have no adverse effect on historic properties.

Description of the Undertaking

The HPHA is seeking to demolish the remaining structures and remove debris from the David Malo Circle and Pi'ilani Homes housing projects, located in Lāhainā, Maui, as part of recovery efforts following the wildfire natural disaster that impacted the town of Lāhainā in August 2023 (Lāhainā Wildfires). The intent of the proposed undertaking is to prepare both properties for the future reconstruction or redevelopment of the housing units that were lost to the fires. This undertaking just includes demolishing remaining structures on these two housing sites. HPHA is still evaluating reconstruction to replace the total 60 units lost or redevelopment options for these sites, therefore, there are no plans established for these housing sites at this time. A location map is included in Attachment A for reference.

The David Malo Circle housing project consisted of 18 units within eight ground-level duplexes with one, two, and three bedrooms per unit and a single two-story duplex with four bedrooms. Within the David Malo Circle development, all nine duplexes were destroyed by the wildfire. Cleanup efforts administered by the County of Maui in cooperation with the U.S. Army Corps of Engineers (USACE), U.S. Environmental Protection Agency (USEPA), and the Federal Emergency Management Agency (FEMA) were recently completed. Debris from the site have been removed and contaminated soils within the former building footprints have been removed and replaced with clean gravel. HPHA seeks to demolish and remove the remaining structures (light poles, trash enclosures, mailboxes, etc.) on the property and conduct site cleanup for other areas not conducted by the federal agencies. Attachment A includes an aerial photo of this housing development before and after the fire along with site photos taken.

The Pi'ilani Homes housing project consisted of 42 dwelling units located throughout eight ground-level apartment buildings. These buildings contained studio and one-bedroom units. A single-story community center with a laundry room was available to serve the residents of the project. Within the Pi'ilani Homes development, three of the apartment buildings, the community center, and the pavilion were destroyed by the fire. The cleanup efforts administered by the County of Maui in cooperation with the USACE, USEPA, and FEMA for this site were also recently completed. Debris from the site has been removed and contaminated soil within the former building footprints have been removed and replaced with clean gravel. HPHA seeks to demolish and remove the remaining structures on the property and conduct site cleanup for other areas not conducted by the federal agencies. Attachment A includes an aerial photo of this housing development before and after the fire along with site photos taken.

Area of Potential Effect (APE)

The Area of Potential Effect (APE) consists of both housing properties that total 4.01 acres. David Malo Circle is located at 723 Mill Street and identified as Tax Map Key (TMK) (2) 4-6-010:028. Pi'ilani Homes is located at 1028 Waine'e Street and identified as TMK (2) 4-5-007:005. The property containing David Malo Circle is 1.56 acres and the property containing Pi'ilani Homes is 2.45 acres.

Identification of Existing Historic Properties

Existing historic properties were identified based upon prior studies and consultations by HPHA with the State Historic Preservation Division (SHPD) along with a new assessment of architectural considerations based upon the impact from the wildfire. Both housing sites are located within the Lāhainā National Historic Landmark (NHL) District.

Prior HPHA Environmental Review of Housing Developments

In 2021 and 2023, Environmental Review documents were completed by HPHA for the repair and rehabilitation of David Malo Circle and Pi'ilani Homes, respectively. In 2015 and 2021, Fung Associates, Inc. (FAI) completed architectural reconnaissance level surveys (RLS) for David Malo Circle and Pi'ilani Homes, respectively, as part of those HPHA Environmental Review documents.

Consultation with SHPD during the production of those documents indicated that repair and rehabilitation improvements at either housing project would have "no adverse effect", provided HPHA implemented certain minimization measures during the improvements. Recommended minimization measures included: 1) those for architectural improvements to existing buildings at Pi'ilani Homes; and 2) those addressing ground disturbance at both housing sites.

Updated Evaluation by Mason Architect, Inc. (September 2024)

A site visit to both properties was conducted by Mason Architects, Inc. (MASON) in September 2024 to assess present conditions and evaluate the remaining historic significance of these housing sites given the level of damage from the wildfire. Their findings are discussed in the assessment of effects, and a copy of their draft evaluation memo is provided in Attachment B.

Section 106 Consultations

Consultation efforts were conducted by Bowers+Kubota Consulting, Inc. (B+K) to solicit input from organizations and the general public. A notice soliciting comments on this

project and historic properties under Section 106 of the NHPA was included in the October 8, 2024's issue of *The Environmental Notice* published by the Environmental Review Program, State Office of Planning and Sustainable Development (Attachment C). A 30-day comment period was provided that ended on November 7, 2024, and no comments were received.

Letters with project information were also sent to agencies and organizations to solicit comments on October 3, 2024 with a 30-day comment period. A consultation letter was also submitted by B+K to SHPD under HICRIS that generated a 2024PR01198 project number for this project on October 9, 2024. A list of those consulted parties is provided below.

- State Historic Preservation Division
- State Office of Hawaiian Affairs
- County of Maui, Department of Planning
- Aha Moku o Maui, Inc.
- Association of Hawaiian Civic Clubs
- Historic Hawai'i Foundation
- Hui Iwi Kuamo'o
- Lahaina Restoration Foundation
- Na Aikane o Maui Community Foundation
- Kipuka Olowalu
- Paukukalo Hawaiian Homes Community Association
- Association of Hawaiians for Homestead Lands
- Kimokeo Foundation

A comment letter was received from the Historic Hawai'i Foundation (HHF) and is included in Attachment C along with a response letter. A summary of their comments and our responses to pertinent ones are provided.

1. HHF and HPHA agree that both David Malo Circle and Pi'ilani Homes are no longer eligible for listing in the National Register of Historic Places due to the destruction caused by the Lahaina Wildfire.
2. Both concur that both housing sites are located within the boundary of the Lahaina NHL District but were not contributing to the historic significance of the NHL.
3. Both agree that the demolition of remaining structures within the two housing parcels would not have an adverse effect to historic properties.
4. Both agree that demolition and ground disturbing work should comply with archaeological monitoring plans as approved by SHPD.

5. Commented that any redevelopment plans should be compatible and harmonious with the NHL character, as required by the Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties. HHF requested to be included as a consulting party when redevelopment plans are proposed in order to assess the effect on the NHL. HHF suggested that the SOI standards should be considered when HPHA selects a development partner.
 - *HPHA will address the NHL character in accordance with the SOI standards as part of future reconstruction or redevelopment of these housing sites. HHF will be included as a consulting party at that time.*
 - *HPHA has not yet decided whether to reconstruct these housing sites on their own or utilize a development partner for their redevelopment. However, the standards and guidelines addressing infill development in historic districts would be considered in selecting a development partner, as applicable.*

Effect on Historic Properties

Based upon the updated findings and evaluation from MASON, prior studies and reviews, and consultation efforts, the proposed demolition of remaining structures at both Pi'ilani Homes and David Malo Circle should have "no adverse effect" on a historic property. Neither Pi'ilani Homes nor David Malo Circle are now considered eligible for the NRHP due to the damage caused by the Lahaina Wildfire. Further, the Undertaking should not adversely affect the Lahaina NHL district as these two housing sites were not considered contributing features of the district due to their lack of historic integrity.

However, minimization measures are proposed to address potential archaeological sites (subsurface) due to ground disturbance from demolition activities. In addition, any redevelopment plans should be compatible and harmonious with the NHL character, as required by the SOI Standards for the Treatment of Historic Properties. A summary of this assessment for each housing project is provided.

Historic Architecture - David Malo Circle

The FAI 2015 RLS determined that the David Malo Circle housing development did not meet National Register of Historic Places (NRHP) significance criteria. The FAI study determined that this housing project was reflective of HUD's impetus in the 1960s to integrate public housing into surrounding communities as well as the shift in housing project design from the institutional Zeilenbau plan to that of a suburban neighborhood. However, later rehabilitation efforts for the housing project resulted in the loss of integrity of materials, design, and workmanship for buildings.

The David Malo Circle housing development was thus previously determined as not meeting NRHP criteria and subsequently had no historic architectural sites on the property. Mason's recent site visit confirmed these conditions. With all buildings now being destroyed by the Lahaina Wildfire, demolition of remaining structures on this property should have no effect on historic architecture.

Historic Architecture - Pi'ilani Homes

The FAI 2021 RLS determined that Pi'ilani Homes at that time was deemed eligible for the NRHP under Criteria "A" for its association with the history of the Hawai'i Housing Authority and the efforts undertaken by the sugar industry to house its retired workers in the late 1960s and 1970s. It was also eligible under Criteria "C" for its architectural significance as an early 1970s elderly public housing project which included a central garden layout.

Within the Pi'ilani Homes development, four (including the community building) of the original nine buildings along with a pavilion were destroyed by fire and their foundations have been removed during debris removal by the USACE. Based upon Mason's current site visit, the Pi'ilani Homes housing development was found to have a loss of integrity to the degree that the site would no longer be eligible for the NRHP. Therefore, demolition of remaining structures on this property should have no adverse effect on historic architecture due to the buildings now destroyed and resulting loss of integrity of this housing property. A summary of this finding is provided:

- The location integrity is retained.
- The site setting is not retained where debris cleanup has altered and removed the original landscaping. Further, original landscaping unaffected by the fire has either died or become overgrown and covered in weeds.
- Design integrity of the overall neighborhood is not retained as the garden layout and central landscaped mall have been altered due to the loss of structures which comprised its mauka, makai, and northwestern edges. Additionally, the design consistency identified in FAI's survey is no longer discernable with close to half of the original buildings gone.
- The workmanship of the development is partially retained, with the method of construction still being discernable in the remaining buildings.
- The integrity of feeling has not been retained due to the loss of buildings and landscaping as well as the vacancy of remaining buildings.
- The integrity of association is partially retained as the site is still under the ownership of the HPHA and remains tied to Hawai'i's public housing. However, only about half of the buildings remain and they are currently unoccupied.

Archaeology - David Malo Circle and Pi'ilani Homes

Consultation with SHPD for these two housing projects as part of previous Environmental Reviews conducted by HPHA determined that repair and rehabilitation improvements proposed at that time would have “no adverse effect” on potential archaeological sites, provided HPHA implemented certain minimization measures. Therefore, demolition activities undertaken for these two housing projects under this project should similarly have no adverse effect with the implementation of these minimization measures identified below.

1. Implementation of the SHPD accepted archaeological monitoring plan for all ground disturbance.
2. Submit detailed plans, specifications and a detailed scope of work once the plans have been developed.
3. Submit information (maps, photos, addresses) regarding locations where mature trees (larger than 6-inches in diameter) associated with buildings or structures that are 50 years of age or older are to be removed, will be submitted to SHPD for review.
4. Submit a TMK map showing the full extent of the project area within the affected parcel(s).
5. Submit a description and photographs of current vegetation cover and condition of the project area, including structures, roads, wall or other features within the project area.
6. Provide a summary of land use history, such as previous intensive cultivation, grubbing or grading.
7. Submit copies or dates of previously approved permits, survey reports, and/or prior SHPD review letters that pertain to the property.

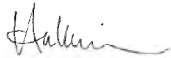
Proposed Determination

HPHA, as the Certifying Official, for conducting demolition work of remaining structures at the David Malo Circle and Pi'ilani Homes housing projects has made a “no adverse effect” determination for this project under Section 106 of the NHPA and is seeking SHPD’s concurrence with its determination. The Lahaina Wildfire has severely impacted these housing developments resulting in the loss of integrity associated with historic architecture at Pi'ilani Homes to the degree that it would no longer be eligible for NRHP. David Malo Circle did not originally qualify for NRHP eligibility but has also been severely damaged. Further, this Undertaking should not adversely affect the Lahaina NHL district as these two housing sites should not be considered contributing features of the district due to their lack of historic integrity.

Dawn N.S. Chang
December 4, 2024
Page 8

We would appreciate SHPD's review of this project and the SHPO's concurrence that this Undertaking consisting of the demolition of remaining structures at these two housing projects would have no adverse effect on historic properties. We respectfully request your written response within 30 days of receipt of this letter. Should you have any questions or require additional information, please contact Ms. Becky L. Choi, State Housing Development Administrator at (808) 832-6020.

Sincerely,

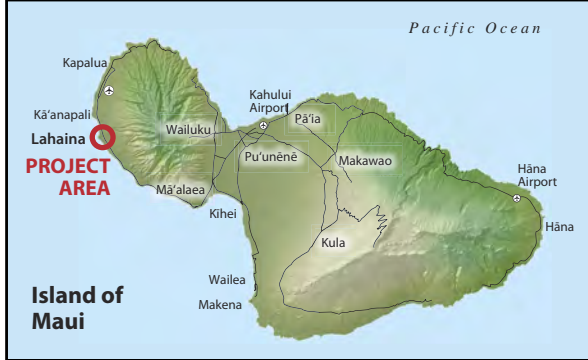


Hakim Ouansafi
Executive Director


Attachment: Enclosure A – Project Location Map, photos
Enclosure B – Mason Evaluation Memo
Enclosure C – 106 Consultations

ATTACHMENT A

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BK
BOWERS + KUBOTA

 NORTH

0 400 800 1200
SCALE IN FEET

LOCATION MAP

March 2023



August 2023



March 2023



November 2023





Photo 01. View of David Malo Circle Housing Site



Photo 02. View of David Malo Circle Housing Site



Photo 03. View of Piilani Homes Site Cleared by USACE



Photo 04. View of Area Between Two Remaining Buildings At Piilani Homes



Photo 05. View of Cleared Areas for Former Buildings at Piilani Homes



Photo 06. View of Piilani Homes Site

ATTACHMENT B



September 20, 2024

Ronald Sato, AICP
Bowers + Kubota
94-408 Akoki Street #201A
Waipahu, Hawai'i 96797

119 Merchant Street
Suite 501
Honolulu, HI 96813

P 808.536.0556
F 808.526.0577

MASONARCH.COM

Re: Section 106 Consultation Support
Proposed Demolition of: Pi'ilani Homes, 1028 Waine'e Street, Lahaina, Maui,
TMK: (2) 4-5-007:005; and
David Malo Circle, 723 Mill Street, Lahaina, Maui, TMK: (2) 4-6-010:028
HICRIS No. [PENDING]

Dear Mr. Sato,

We are providing our evaluations of significance and effect below regarding Hawai'i Public Housing Authority's (HPHA) proposed project to demolish the extant buildings at Pi'ilani Homes and David Malo Circle, Lahaina, Maui. As this project may receive funding from the U.S. Department of Housing and Urban Development (HUD) it is considered a federal undertaking per Section 106 of the National Historic Preservation Act (NHPA) of 1966. The Undertaking proposes to demolish the remaining five buildings at HPHA's Pi'ilani Homes development, which were spared by the August 2023 Lahaina wild fire. All of the David Malo Circle buildings were destroyed by the August 2023 fire; none are extant.

Pre-Fire Significance Evaluations (2015 and 2021)

In 2015 and 2021, Fung Associates, Inc. (FAI) completed architectural surveys for David Malo Circle and Pi'ilani Homes.¹ Their findings were as follows:

- FAI evaluated the Pi'ilani Homes housing area (comprised of nine buildings) as eligible for the National Register of Historic Places (NRHP) under Criteria "A" and "C." (It was comprised of eight single-story apartment buildings, Bldgs. A-H, and one single-story community building, all built in 1969.²)
- FAI evaluated the David Malo Circle housing area (comprised of nine duplexes) as not meeting NRHP significance criteria. (It was comprised of one two-story and eight one-story buildings, Bldgs. 101-109, built in 1966.³)

Refer to Attachment C for selected pages from FAI's pre-fire architectural surveys.

¹ Fung Associates, Inc., *Architectural Inventory Survey for Hawaii Public Housing Authority (Federal Project)* (Honolulu: Prepared for Hawaii Public Housing Authority and HHF Planners, 2015), 59-63; Fung Associates, Inc., *Architectural Reconnaissance Level Survey for Hawaii Public Housing Authority (Federal Projects)* (Honolulu: Prepared for Hawaii Public Housing Authority and HHF Planners, 2021), 152-176.

² Fung Associates, Inc., *Architectural Reconnaissance Level Survey for Hawaii Public Housing Authority (Federal Projects), Final Report, February 2021* (Honolulu: Prepared for Hawai'i Public Housing Authority and HHF Planners, 2021), 153-154, in HHF Planners, *Hawaii Public Housing Authority Environmental Review, Pi'ilani Homes, Lahaina, Maui County, AMP 39, HPHA No. 1044* (Honolulu: Prepared for State of Hawai'i, Hawai'i Public Housing Authority, 2023), Exhibit C.

³ Fung Associates, Inc., *Architectural Inventory Survey Hawaii Public Housing Authority (Federal Projects)* (Honolulu: Prepared for Hawai'i Public Housing Authority and HHF Planners, 2015), 59.



Post-Fire Site Visit Findings

In September of 2024 we made a site visit to Pi'ilani Homes and David Malo Homes to learn of the level of damage caused by the Lahaina wildfire of August 2023 and determine whether the damage would alter FAI's previous significance findings. The following was observed on site:

- Within the Pi'ilani Homes development, four of the original nine buildings were destroyed by fire and their foundations appear to have been removed during debris removal by the Army Corps of Engineers. Buildings B, C, G, and the community building were destroyed. Buildings A, D, E, F, and H remain. (Refer to Attachment A for additional information on Pi'ilani Homes post fire.)
- Within the David Malo Circle development, all nine of the duplexes were destroyed by fire and their foundations appear to have removed during debris removal by the Army Corps of Engineers. (Refer to Attachment B for additional information on David Malo Circle post fire.)

In consideration of these changes that have occurred to the two sites as a result of the August 2023 wildfire, our Section 106 consultation findings are below.

36 CFR 800.4 (a)(1) – Determine and Document the Area of Potential Effect (APE)

The recommended APE for architectural resources is as follows.

- Pi'ilani Homes: The development's entire 2.45-acre parcel, as shown in Figures 1 and 2 (Attachment A).
- David Malo Circle: The development's entire 1.56-acre parcel, as shown in Figures 11 and 12 (Attachment B).

Note: This recommended architectural APE will likely need to be combined with an APE supplied by your archaeological consultant (if applicable), as well as the APE recommended by others for the construction work (laydown space, transportation routes, etc.).

36 CFR 800.4 (b) – Identification of Historic Properties

The historic properties identified within the APEs are as follows:

- Pi'ilani Homes APE: Since the Pi'ilani Homes housing area has lost integrity and is no longer evaluated as eligible for the NRHP (see discussion in 36 CFR 800.4 [c] below), the only historic property in the APE is the Lahaina National Historic Landmark (NHL) District. However, this portion of the Landmark District does not retain historic integrity and should be considered a non-contributing feature of the NHL.⁴
- David Malo Circle APE: Since the David Malo Circle housing area has lost integrity and is no longer evaluated as eligible for the NRHP (see discussion in 36 CFR 800.4 [c] below), the only historic property in the APE is the Lahaina NHL District. However, this portion of the Landmark District does not retain historic integrity and should be considered a non-contributing feature of the NHL.

⁴ The National Park Service (NPS) initially designated the district a National Historic Landmark in 1960s. The district's boundaries were expanded in 1974.



36 CFR 800.4 (c) – Evaluation of Significance

MASON offers the following updated evaluations of significance and integrity in consideration of the changes to the APEs post fire:

- Pi'ilani Homes housing area is evaluated as no longer meeting the NRHP significance criteria. Although it was previously evaluated as historically significant for its associations with Hawai'i's sugar industry of the late 1960s and 1970s as an intact example of a housing area for retired sugar workers, nearly half of the development was destroyed by the August 2023 fire and it no longer has the ability to convey the associations of an intact neighborhood to an observer. Therefore, it does not meet NRHP significance Criterion "A." Further, although it was previously evaluated as an intact example of an early 1970s elderly public housing project that employed a garden layout with a central landscaped mall area, the August 2023 fire substantially altered its layout by the demolition of four of the nine buildings. The fire also destroyed its landscaping. Therefore, it lacks sufficient integrity to convey its original garden layout with central landscaped mall, and no longer meets Criterion "C." (For additional information, refer to the Post-Fire Integrity Assessment in Attachment A.)
- David Malo Circle was evaluated as not meeting NRHP Criteria in FAI's previous architectural survey. All nine buildings were destroyed by the fire and it remains not eligible for the NRHP.

36 CFR 800.5 – Assessment of Adverse Effects

The Undertaking involves demolition of the remaining buildings at Pi'ilani Homes. No demolition work will be required at David Malo Circle because it contains no remaining buildings.

MASON proposes a "Finding of no adverse effect" for the Undertaking, as neither Pi'ilani Homes nor David Malo Circle are eligible for the NRHP, and the demolition of the Pi'ilani Homes buildings will not adversely affect a historic property. Further, the Undertaking will not adversely affect the Lahaina NHL as the two neighborhoods should not be considered contributing features of the district due to their lack of historic integrity.

You may use the information from this letter to work with the Hawai'i Public Housing Authority and the U.S. HUD to support the Section 106 process.

Regards,

A handwritten signature in black ink that reads 'Polly Tice'.

Polly Tice
Principal and Research Section Director





Attachment A: Pi'ilani Homes Additional Information



Figure 1. Pre-fire aerial image of Pi'ilani Homes, showing APE. (HHF Planners, 2023)



Figure 2. Post-fire aerial image of Pi'ilani Homes, showing buildings destroyed by fire (outlined in light blue). (aerial image: Google, 2023; graphics: MASON, 2024)





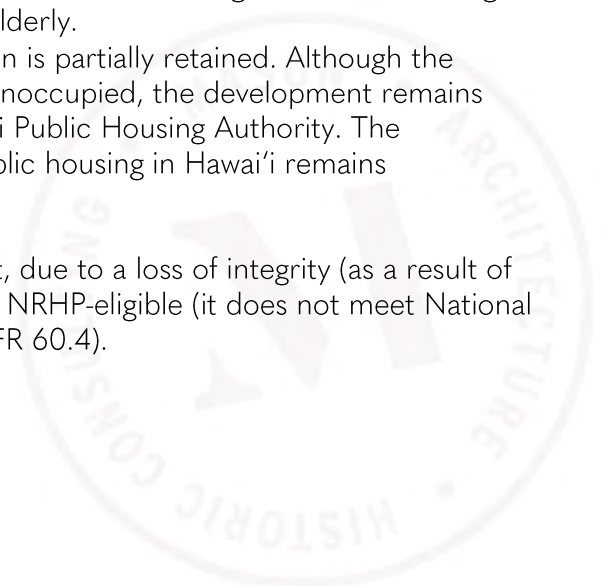
(Attachment A Cont.)

Pi'ilani Homes Post-Fire Integrity Assessment

While some buildings remain, and therefore some aspects of integrity are partially retained, Pi'ilani Homes lack sufficient integrity to meet the NRHP Criteria as follows:

- Location – Integrity of location is retained. The neighborhood development is in its original location.
- Setting – Integrity of setting is not retained. Where debris cleanup has occurred within the housing area, original landscaping has been removed and the lot's grade has been altered to account for any potential hazardous materials. Any original landscaping that was unharmed by the fire has either died or become overgrown/covered in weeds.
- Design – Integrity of design of the overall neighborhood is not retained. Before the fire, FAI determined that Pi'ilani Homes was significant for its garden layout with central landscaped mall. With four of the nine buildings destroyed by fire and no longer extant, this layout has been altered. The central landscaped mall now lacks buildings on its mauka, makai, and northwestern edges. Additionally, FAI stated that the design consistency among the buildings allowed the entire complex to be perceived as a distinctively identifiable whole. With nearly half of the development's buildings gone, this is no longer discernable.
- Workmanship – Integrity of workmanship is partially retained. For the remaining buildings, the vernacular method of construction they employed is still discernable.
- Materials – Integrity of materials is partially retained. For the remaining buildings, their simple materials, including concrete masonry unit (CMU) walls, plywood covered gables with plywood battens, aluminum framed sliding doors (for back lanai), and aluminum framed glass jalousies are all still discernable.
- Feeling – Integrity of feeling is not retained. Because the remaining buildings are vacant and half of the development, along with much of its landscaping and its central mall area, is no longer extant it no longer retains its feeling as a public housing complex for the elderly.
- Association – Integrity of association is partially retained. Although the remaining buildings are currently unoccupied, the development remains under the ownership of the Hawai'i Public Housing Authority. The development's association with public housing in Hawai'i remains unchanged.

Based on the above, MASON found that, due to a loss of integrity (as a result of fire damage), Pi'ilani Homes is no longer NRHP-eligible (it does not meet National Register Criteria, as established in 36 CFR 60.4).

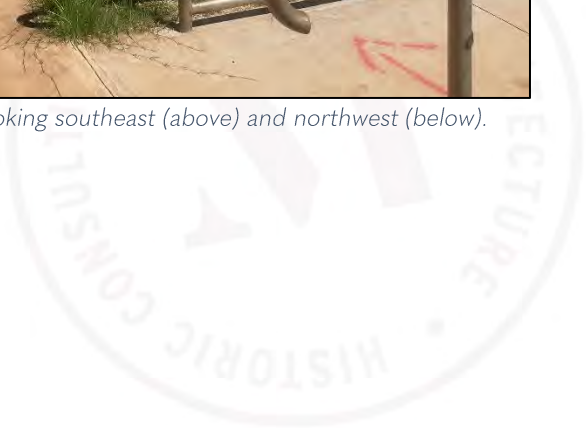




Post-fire images of Pi'ilani Homes



Figure 3. Location of former community building, looking southeast (above) and northwest (below). (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 4. Central mall between Buildings A and H (above), and northwest and southwest facades of Building A (below). (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 5. Southwest facade of Building A (above) and northwest and northeast facades of Building H (below). (MASON, September 2024)



Post-fire images of Pi'ilani Homes



Figure 6. Northeast façade of Building H (above) and southeast facades of Buildings H and A with former location of Buildings G and B visible in the foreground (below). (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 7. Former location of Buildings B, C, and G with Buildings D, E, and F visible in the distance. (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 8. Buildings D, E, and F, looking northwest (above) and northwest and southwest facades of Building D (below). (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 9. Northeast façade of Building E (above) and northeast façade of Building F (below). (MASON, September 2024)





Post-fire images of Pi'ilani Homes



Figure 10. Former location of Building G (above) and Former Location of Building G with former location of Building C visible to the left (MASON, September 2024)



Attachment B: David Malo Circle Additional Information



Figure 11. Pre-fire aerial image of David Malo Circle, showing APE. (HHF Planners, 2021)

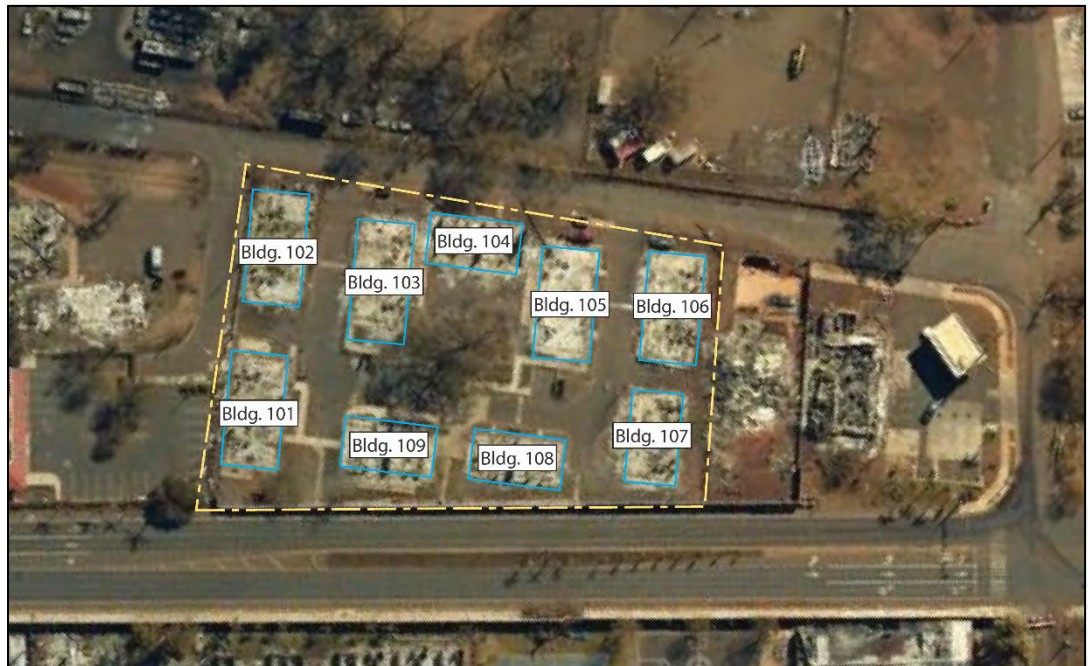


Figure 12. Post-fire aerial image of David Malo Circle, showing buildings destroyed by fire (outlined in light blue). (aerial image: Google, 2023; graphics: MASON, 2024)





Post-fire images of David Malo Circle



Figure 13. Location of former David Malo Circle development, camera facing southwest (above) and north-northwest (below). No buildings are extant, following the fire. (MASON, September 2024)





Post-fire images of David Malo Circle

(Attachment B Cont.)



Figure 14. Location of former David Malo Circle development, camera facing southwest (above) and southeast (below). (MASON, September 2024)



Attachment C: Selected Pages from FAI's Pre-Fire Architectural Surveys





Source: State of Hawaii GIS Data and Google Earth Pro - 1/12/2013

HPHA No. 1044 - Pi'ilani Homes (AMP 39)

Figure 2 - Project Site & APE Map

Lahaina, Maui



50 FEET



EXHIBIT C
Architectural
Reconnaissance Level
Survey (ARLS) for Hawaii
Public Housing Authority
(FEDERAL PROJECTS)
Final Report February, 2021
Prepared By:
Fung Associates Inc.

Architectural Reconnaissance Level Survey for
Hawaii Public Housing Authority
(FEDERAL PROJECTS)

Final Report
February, 2021

Prepared By:
Fung Associates Inc.
1833 Kalakaua Avenue, Suite 1008
Honolulu, HI 96815

For:
Hawaii Public Housing Authority
and HHF Planners

EXECUTIVE SUMMARY

This report records the findings of a historic architectural reconnaissance level survey (RLS) of selected public housing projects operated by the Hawaii Public Housing Authority (HPHA), which was previously known as the Housing and Community Development Corporation of Hawaii (HCDCH) by 1998; and the Hawaii Housing Authority (HHA) until 2005. For purposes of this report, the historic name Hawaii Housing Authority will be utilized only within its historic context. This survey was undertaken in anticipation of future HPHA projects utilizing federal funding and fulfills the 36 CFR.800 requirement for identification of historic properties.

The objective of the survey is to study twelve HPHA housing projects that have recently reached age of eligibility (50-year mark), and two HPHA individual buildings. The surveyed properties are projected to undergo repairs and rehabilitation in the not too distant future, and was evaluated to determine eligibility as a historic resource. In keeping with the Advisory Council for Historic Preservation guidelines, this report identifies those which appear to meet the criteria for listing in the National Register of Historic Places.

Each of the housing projects covered in this report was visited, photographed, researched, and evaluated for historic significance. After consideration of each resource in its historic context, seven of the twelve projects, and the Lanakila Community Center were considered to meet National Register eligibility criteria. Their significance is based on their role in the social history of Hawaii, being representative of the efforts of a State-wide housing reform movement, and/or for their architecture, being reflective of a type, style, method of construction, and materials utilized during the period in which they were constructed. The properties which were considered to not meet the criteria for listing in the National Register of Historic Places, were so evaluated because of their loss of integrity.

Table 1 summarizes these evaluations. The projects determined National Register eligible are highlighted.

Organization of Report

The first section of the report summarizes the National Register eligibility criteria. The second section covers the project objectives, while the third section covers the methodology and coverage. The fourth section covers the project boundary and justification. Section five includes a brief history of public housing in Hawaii focusing on the period approximately 1967-1980. The housing covered in the inventory either was constructed or came under the administration of the HHA. Section six includes RLS survey forms for each of the housing projects. These forms include descriptions of the property, a list of character defining features, historic contexts, descriptions, eligibility recommendations, historic assessment photos, and maps or site plans. The seventh section is a summary of National Register findings with recommendations. A bibliography is provided at the end of the report.

EXECUTIVE SUMMARY

HA #	Island	Project Name	Address	Year Built/ Occupied	Architect/Builder	National Register Eligibility
1004	Hawaii	Lanakila Homes II (Office and Baseyard Building)	Waiola Street. and Ipuka Street.	1952	Bruce Price Harden	Not Eligible
1004	Hawaii	Lanakila Homes II (Community Center)	Waiola Street. and Ipuka Street.	1969	Tom Mizuno	Eligible
1023	Kauai	Home Nani	Moana Road. and Laau Road.	1970	Michael T. Suzuki & Associates	Eligible
1031	Hawaii	Hale Hauoli	45-540 Koniaka Place.	1970	Wilson, Okamoto & Associates	Eligible
1032	Hawaii	Kaimalino	74-5060 Kealakaa Street.	1971	Walter Tagawa	Not Eligible
1036	Oahu	Paoakalani	1583 Kalakaua Avenue.	1970	Luke, Miyamoto & Associates	Eligible
1038	Oahu	Waipahu I	94-111 Pupuole Place.	1970	Robert G. Helg	Not Eligible
1039	Oahu	Waipahu II	94-132 Pupuohi Street.	1969	Steve Au	Not Eligible
1044	Maui	Piilani Homes	1028 Wainee Street.	1970	Noboru Kobayashi	Eligible
1045	Hawaii	Pahala	96-1169 Holei Street.	1972	Frank Slavsky & Associates	Eligible
1046	Oahu	Makamae	21 South Kuakini Street.	1971	Milton Sher. Architect & Associates	Eligible
1047	Oahu	Pumehana Homes	1212 Kinau Street.	1972	Walter K. Tagawa, A.I.A. & Associates.	Eligible
1066	Oahu	Salt Lake Apartments	2907 Ala Ilima Street.	1969	Edward Miyamasu, A.I.A	Not Eligible
1073	Oahu	Spencer House	1035 Spencer Street.	1968	J. Paul Rognstad & Associates, Inc.	Not Eligible

Table 1: Summarizing National Register Eligibility Evaluation (Chronological Order of HA #)
Source: Fung Associates Inc., 2020

While we greatly respect and honor the Hawaiian language as *ka olelo makuahine o Hawaii* (the mother tongue of Hawaii) and recognize it is one of two official languages in the State of Hawaii, we acknowledge that the global use and readability of diacritical markers (the *kahako* and *okina* macron and glottal stop, respectively) in electronic formatting may cause words to display incorrectly when presented in different documentation and databases. Accordingly, diacritical markers have been omitted from Hawaiian words and place names in this report, and we apologize for its non-inclusion in this draft. Mahalo for your understanding in this regard.

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NATIONAL REGISTER OF HISTORIC PLACES ELIGIBILITY CRITERIA

In order to determine the significance of a historic property, the property must be evaluated based on the National Register of Historic Places' Criteria for Evaluation. The following excerpt was taken from the National Register Criteria, Title 36 CFR, §60.4, Criteria for Evaluation:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

A. *that are associated with events that have made a significant contribution to the broad patterns of our history; or*

B. *that are associated with the lives of persons significant in our past; or*

C. *that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or*

D. *that have yielded, or may be likely to yield, information important in prehistory or history.*

National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation* provides an explanation on how to apply the criteria listed above. In summary, historic resources are evaluated by applying the four-significance criteria A through D, and then determining which of the seven aspects of integrity are present to convey its significance: location, design, setting, materials, workmanship, feeling, or association.

STATEMENT OF PROJECT OBJECTIVES

MAPS



1 HISTORIC ASSESSMENT MAP - WAIPAHU II
SCALE: NOT TO SCALE

Figure 132: Waipahu II Historic Assessment Map
Source: Fung Associates Inc., 2020

PIILANI HOMES

HISTORIC PROPERTY INFORMATION AND ASSESSMENT SUMMARIES

Project Name	Piilani Homes
Historic Name	N/A
Architect/Builder	Noboru Kobayashi
Built	1969 (Built), 1970 (Occupied)
National Register Eligibility	Eligible
Criteria	A and C
Significance	Association with history of the Hawaii Housing Authority and with the efforts undertaken by the sugar industry in the late 1960s and 1970s to provide housing for its retired workers. Architecturally significant as an early 1970s elderly public housing project using a garden layout focused on a central landscaped mall area.
Character Defining Features	Single-story building masses, lateral running, composition shingled gable roofs, overhanging eaves with exposed rafter tails, concrete slab foundation, CMU walls with plywood and batten gable ends, concrete sidewalks, jalousie windows, intact original floorplan, garden layout focused on a central landscaped mall area

State Historic Preservation Division
Reconnaissance Level Survey - Survey Form
Individual Resource Information

4. Property Location	5. Property Classification:
4.1 TMK [e.g. (1) 1-2-003:004]: (2) 4-5-007:005	5.1 Ownership <input type="checkbox"/> Private <input checked="" type="checkbox"/> Public
4.2 Street Address: 1028 Waivee Street	5.2 Classification
4.3 County: Lahaina	<input checked="" type="checkbox"/> Building <input type="checkbox"/> Structure
4.4 State: Hawaii	<input type="checkbox"/> District <input type="checkbox"/> Object
4.5 Zip Code: 96761	<input type="checkbox"/> Site

6. Property Function:	
6.1 Current: Residential	6.2 Historic: Residential

7. Property Description
7.1 Date of Construction: 1969 (Built) 1970 (Occupied)
7.2 Provide a description of the property, including the character defining features, summarize alterations to the property, and provide an evaluation of the property's integrity of materials, design, feeling, location, association, workmanship, and setting.

Piilani Elderly Housing is located on a flat lot in the town of Lahaina between Waivee Road and Honoapiilani Highway, in a predominantly apartment/commercial retail area. Sited on a 2.62 acre parcel this housing project consists of eight single story apartment buildings of 1-bedroom and studio units. In addition, there is a free-standing community meeting building which also contains a laundry room and an office and storage.

The property is entered from Waivee Road, where a chain link enclosed, paved, parking lot defines the northwest terminus of the trapezoidal shaped property. A chain link fence also encloses the residential portion of the property with a concrete sidewalk leading from the parking lot to the community center building which has a southwest-northeast orientation and defines the northwest end of the mall. The eight apartment buildings are sited around a central mall, with three buildings (A, B, C and F, G, H) on each side of the mall and two buildings (D and E) defining the southeast end of the mall (Refer to Figure 133 Piilani Building Type Map).

PROPERTY DESCRIPTION

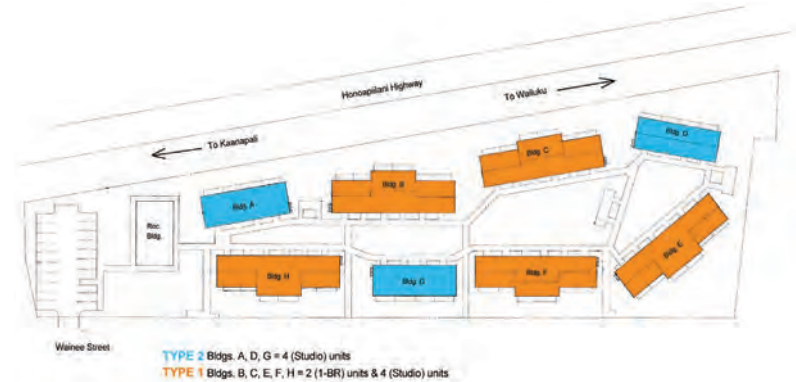


Figure 133: Piilani Building Type Map
 Source: Fung Associates Inc., (2020)
 Base Image: Provided by the HPHA (Accessed 2020)

There are two types of apartment buildings which house an overall total of ten, 1-bedroom and thirty-two studio units:

- Type 1 (Building B, Building C, Building E, Building F, and Building H). Each Type 1 building consists of two 1-bedroom apartments, and four studio units.
- Type 2 (Building A, Building D, Building G). Each Type 2 building consists of only four-studio units.

The mall is a lawn with several mature trees planted in it, which include: mountain apple (*Eugenia malaccensis* plumeria (*Plumeria* sp), and Norfolk pine (*Araucaria heterophylla*), as well as such shrubs as Chinese hibiscus (*Hibiscus rosa-sinensis*), ti (*Cordyline terminalus*) and a mock orange hedge (*Murraya paniculata*).

PROPERTY DESCRIPTION

The community meeting building sits on a concrete slab foundation and has concrete masonry unit (CMU) walls. It has a front facing, composition shingled gable roof with overhanging eaves with exposed rafter tails. The gable ends are of plywood with battens. The building faces southwest and has two pairs of aluminum sliding doors to serve as entries. The sliding doors open on the meeting room, which has a vinyl tile floor and a gypsum board ceiling. In addition to the front doors, a set of double doors on the southeast side and two more sets of double doors on the northwest side provide access to the meeting room. In addition, the housing project's mailboxes are in the southeast wall of the building, and a door near the rear on this side accesses the laundry room. Double doors in the rear wall of the building open on a large storage room. Also, a single door in the rear elevation accesses an office. All windows are jalousie with crank handles, with the restroom windows in the southeast wall being placed at the top of the wall.

All the apartment buildings are single story with lateral running, composition shingled, gable roofs with overhanging eaves with exposed rafter tails. The buildings are similar to the community meeting hall in that they sit on a concrete slab foundation, and have CMU walls with plywood and batten gable ends. Concrete sidewalks run in front of the buildings and connect one building to another. In addition, a concrete sidewalk runs along the length of the rear of each building.

Type 2 (Building A, Building D, Building G) are four bays long with each bay containing a front door with a screen door, flanked on one side by a narrow, near floor to ceiling jalousie window and on the other by a pair of wider, near floor to ceiling jalousie windows. On the interior, the studio units have vinyl tile floors with 3-inch high baseboards and gypsum board ceilings. Drywall is used for the partition walls to enclose the closets and bathroom. The main space is an L-shape with the kitchen located behind the front door in the bottom of the L. Some of the kitchens retain their pressed wood cabinets, countertop and stainless-steel sink which may be original, however, these are in poor condition and are being replaced. The narrow jalousie window is in the kitchen's front wall. The bathroom and closets are to

PROPERTY DESCRIPTION

the rear of the kitchen and accessed from a door in the side wall of the living room. The bathroom has a separate alcove for the toilet. The original scalloped sink sits in a pressed wood cabinet and the tub has a shower. A narrow, near floor to ceiling jalousie window, similar to that in the kitchen is in the back wall of the bathroom. In the same wall as the bathroom door is a closet with a pair of sliding doors. In the rear wall of the living room is a pair of aluminum sliding doors which open on a small concrete patio and the backyard.

Type 1 Buildings (Building B, Building C, Building E, Building F, and Building H) are six bays long. They have a continuous straight wall line across their fronts, but in the rear the two center bays project outward. The two bays at each end of the building contain the studio units and these are identical to the studio units in the Type 2 Buildings, which are exclusively studio buildings, on both the exterior and interior. The facades of the Type 1 Buildings one-bedroom units have a pair of near floor to ceiling jalousies on one side of the door, but on the other, as opposed to the long narrow jalousie of the studio units, it has a full sized, near floor to ceiling jalousie window. On the interior the living room runs the width of the unit and a dry wall partition wall separates the kitchen from the living room. The kitchen is to the rear of the living room and is accessed by the living room flowing around the partition wall at one end. The kitchen is long and narrow, with the sink and stove against the wall separating the room from the living room and the refrigerator on the opposite wall. Both sides of the kitchen have cabinets and counter space. The counters and cabinets have been replaced in many units. A door in the rear wall of the kitchen opens on the bedroom. The bedroom has a set of aluminum sliding doors in its rear wall, and a closet with sliding doors in its front wall. The bathroom is through a door in the bedroom's sidewall behind the kitchen. It includes a tub and, in many units, has been remodeled.

PROPERTY DESCRIPTION

Character Defining Features:

- Single story building masses
- Lateral running, composition shingled, gable roofs
- Overhanging eaves with exposed rafter tails
- Concrete slab foundation
- CMU walls with plywood and batten gable ends
- Concrete sidewalks run in front of the buildings and connect one building to another
- Jalousie windows
- Intact original floorplan
- Garden layout focused on a central landscaped mall area

8. Eligibility Recommendation:

8.1 Provide a recommendation of eligibility to the Hawaii Register of Historic Places including applicable criteria and areas of significance.

Piilani Homes remains relatively intact, whereas the layout of the complex and the exteriors of the buildings remain very intact. The only major changes to the site are on the interior and involve the remodeling of a number of the kitchens and bathrooms. Some jalousie windows and their mechanisms have been replaced, but these have been in-kind replacements. These alterations are not sufficient to affect the historic character of the building in a significant manner. As such, the complex retains its integrity of location, setting, design, materials, workmanship, feelings and associations.

Piilani Homes appear to be significant at a statewide level under **Criterion A** for its associations with the efforts undertaken by the sugar industry in the late 1960s and 1970s to provide housing for its retired workers. Piilani Homes was designed as a turnkey project. This development approach had been inaugurated by the Department of Housing and Urban Development (HUD) in 1966, and was first utilized in Hawaii in 1969 for the development of Maile I, Nanakuli Homes and Maile II. Under this program a private developer would approach a local housing authority with a proposed site and a building proposal which met federal standards. Prior to the start of construction, the local authority would provide the developer a letter of intent to purchase the development once it was constructed, and the federal government would provide the developer interim financing until a private source of funding was secured. Thus, dwellings were built by private developers just as any other subdivision or apartment, but with the guarantee that the local housing authority would purchase the entire subdivision or building upon its completion.

This new vehicle for the construction of low-cost housing offered a number of benefits to both the public and the developer. It was found that the private sector could build affordable housing faster and at a 10-15% lower cost than the government. In turn, the developer did not need to be concerned about selling the property once it was completed, which at the front end made obtaining financing easier. The new approach also promoted a diversification of designs, methods and locations, all of which

ELIGIBILITY RECOMMENDATIONS

had become federal policy concerns during the 1960s. Because of such added flexibility, it was felt the turnkey approach would aid in distributing low-income families throughout the community. The turnkey approach, was believed to elevate the life styles of lower income families by having them live in the same environment with families of higher income levels. This would allow less possibility of being specifically identified as public housing tenants, and provides a scattered number of sites that prevent large concentrations of low-income families.¹ This provides opportunities for economic and social development for low-income families. In addition to Piilani Homes, Home Nani on Kauai and Pahala Elderly Housing on the Hawaii island utilized the turnkey approach to development.

Piilani Homes was undertaken by Amfac, the owner of the Pioneer Mill Sugar Company in Lahaina, and was designed by Maui architect Noboru Kobayashi. The housing was built on Amfac's lands and was developed by them to house their retired plantation employees. Ground was broken on the \$800,000 project in February 1970, with construction undertaken by F & M Contractors of Wailuku. By the end of August 1970, when the property was turned over to the HHA, the first seven occupants had already moved into their new homes.

Piilani Homes was part of an effort by the HHA to develop elderly housing for retired plantation workers on the neighbor islands. Other projects included Home Nani in Waimea, Kauai, Hale Hauoli in Honokaa, and C. Brewer's Pahala Elderly Housing all of which utilized the turnkey approach to development. As opposed to the high-rise elderly housing projects undertaken on Oahu, the neighbor island elderly housing projects were all single-story buildings.

¹ Dewa Y. Roger, and Stanley A. Patrick, "Public Housing In Hawaii-The Evolution of Housing Policy Volume 1: Description and Analysis," *Legislative Reference Bureau*, University of Hawaii, 1967

ELIGIBILITY RECOMMENDATIONS

Piilani Homes also meets **Criterion C** as a good example of an early 1970s elderly public housing project developed by the HHA on Maui, using a garden layout focused on a central landscaped mall area. Piilani Homes is typical of its period in its move away from the Zeilenbau planning (long and shallow apartment blocks, organized in parallel rows, spaced widely) approach to public housing and to a more suburban, residential approach. A similar approach was also applied to the elderly housing projects Home Nani on Kauai (1970), Hale Hauoli (1970) and Pahala Housing (1972) on the island of Hawaii. An informal, non-institutional atmosphere is achieved through Piilani Homes scattering of the two different building types throughout the housing project, and its use of a central landscaped mall area. The buildings' design consistency allows the entire complex to be perceived as a distinctly identifiable whole.

The architect for Piilani Homes was Maui architect Noboru Kobayashi. In the late 1930s he worked as a draftsman for the Maui County Public Works Department and by the early 1950s had become the head of the Maui County Building Inspection Department and Superintendent of school repairs. In the mid-1950s he opened his own architectural office and designed such buildings as: Lahaina Public Library (1955), the Aluli Building on Market Street, Wailuku (1956), Andrew S. Freitas Residence (1958), Wailuku War Memorial Gym (1960), Kahului Public Library (1962), David Malo Dormitory at Lahainaluna (1962), Hale Makua Nursing Home (1964), Maui Savings & Loan (1965), Maui Health Center in Wailuku (1967), Maui Boy Scouts HQ (1968), and the J. Walter Cameron Center on the grounds of Maui Memorial Hospital (1969). He also developed the Kihei Master Plan (1969).

Piilani Homes appears to meet the criteria for listing in the National Register of Historic Places.

9. Photographs
 Attach Photographs: provide sufficient photographs to illustrate the property's main features. At a minimum provide the following:

Quantity	Description
1-2	Street view(s) of the resource setting
1-2	Main facades
1-2	Interior photos if applicable



Figure 134: Piilani Homes Entrance
 Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 135: Piilani Homes Building A Left Elevation (right side similar)
 Source: Fung Associates Inc., 2020



Figure 136: Piilani Homes Building A Front Elevation
 Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 137: Piilani Homes Building B Front Elevation
Source: Fung Associates Inc., 2020



Figure 138: Piilani Homes Building B Rear Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 139: Piilani Homes Building C Left Elevation (right side similar)
Source: Fung Associates Inc., 2020



Figure 140: Piilani Homes Building C Front Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 141: Piilani Homes Building D Rear Elevation
Source: Fung Associates Inc., 2020



Figure 142: Piilani Homes Building D Front Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 143: Piilani Homes Building E Rear Elevation
Source: Fung Associates Inc., 2020



Figure 144 bottom: Piilani Homes Building E Front Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 145: Piilani Homes Building F Side Elevation
Source: Fung Associates Inc., 2020



Figure 146: Piilani Homes Building F Front Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 147: Piilani Homes Building G Side and Rear Elevation
Source: Fung Associates Inc., 2020



Figure 148 bottom: Piilani Homes Building G Front Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 149: Piilani Homes Building H Side Elevation
Source: Fung Associates Inc., 2020



Figure 150: Piilani Homes Building H (Wainee Street View)
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 151: Piilani Homes Community Center Northeast Elevation
Source: Fung Associates Inc., 2020



Figure 152: Piilani Homes Community Center Southeast Elevation
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 153: Piilani Homes Community Center Laundry Room
Source: Fung Associates Inc., 2020



Figure 154: Piilani Homes Community Center Interior
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 155: Piilani Homes central mall
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 156: Piilani Homes Building A Studio Unit Interior Living Area
Source: Fung Associates Inc., 2020



Figure 157: Piilani Homes Building A Studio Unit Interior Kitchen
Source: Fung Associates Inc., 2020

PHOTOGRAPHS



Figure 158: Piilani Homes Building H One-Bedroom Interior Kitchen
Source: Fung Associates Inc., 2020

10. Map

Attach Map showing the location of the property

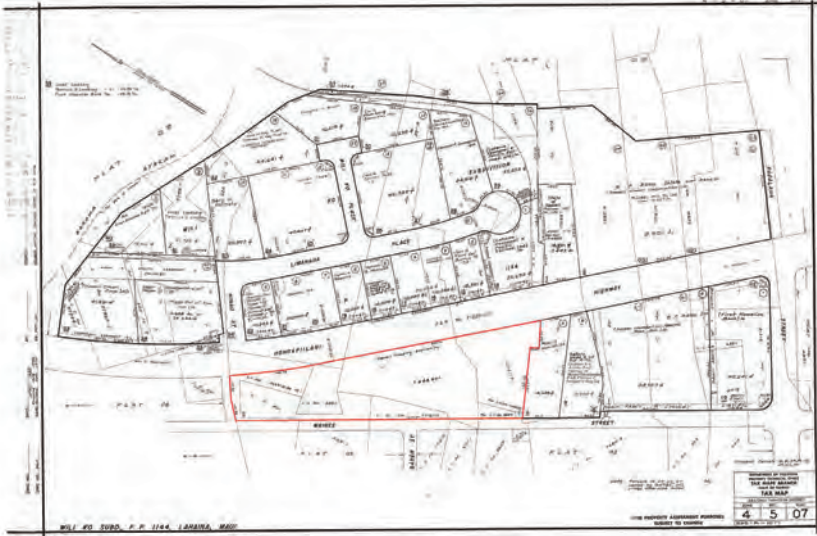


Figure 159: Pili Homes TMK Map
Source: City and County of Honolulu, 2020



Figure 160: Pili Homes Site Map
Source: Google Earth, 2020

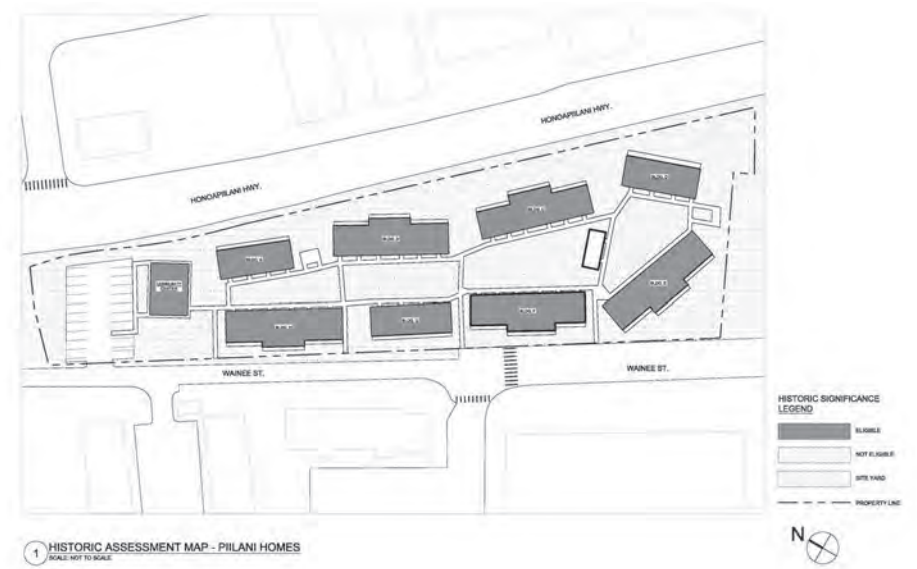


Figure 161: Pili Homes Historic Assessment Map
Source: Fung Associates Inc., 2020

**ARCHITECTURAL INVENTORY SURVEY
HAWAII PUBLIC HOUSING AUTHORITY
(FEDERAL PROJECTS)**

Prepared by
Fung Associates, Inc.
1833 Kalakaua Avenue, Suite 1008
Honolulu, HI 96815

For

Hawaii Public Housing Authority
and
HHF Planners

May, 2015

EXECUTIVE SUMMARY

This report records the findings of a historic architectural reconnaissance survey of selected public housing projects operated by the Hawaii Public Housing Authority (HPHA), which was previously known as Housing and Community Development Corporation of Hawaii (HCDCH); and Hawaii Housing Authority (HHA). It was undertaken in anticipation of future HPHA projects utilizing federal funding and fulfills the 36 CFR.800 requirement for identification of historic properties.

The objective of the survey was to study twenty-three HPHA housing projects targeted for repairs and rehabilitation, and to evaluate which properties should be considered historic resources. In keeping with Advisory Council for Historic Preservation guidelines, this report identifies those which appear to meet the criteria for listing in the National Register of Historic Places.

Each of the housing projects covered in this report was visited, photographed, researched, and evaluated for historic significance. After consideration of each resource, ten of the twenty three projects were considered to meet National Register eligibility criteria. Their significance is based on their role in the social history of Hawaii, being representative of the efforts of a Territory-wide and State-wide housing reform movement, and also for their architecture, being reflective of a type, style, method of construction, and materials utilized during the period in which they were constructed. All of the properties which were considered to not meet the criteria for listing in the National Register of Historic Places, were so evaluated because of their loss of integrity.

Table 1 summarizes these evaluations. The ten projects determined National Register eligible are highlighted.

Table 1: Summarizing National Register Eligibility Evaluation (Chronological Order)

	Island	Project Name	Project Type	Year Built	National Register Eligibility
1	Oahu	Puahala Homes I	State	1952	Not Eligible
2	Oahu	Puahala Homes II	State	1952	Not Eligible
3	Oahu	Kalihi Valley Homes	Federal	1953	Eligible
4	Oahu	Palolo Valley Homes	Federal	1957	Eligible
5	Oahu	Puahala Homes III	State	1959	Not Eligible
6	Oahu	Puahala Homes IV	State	1959	Not Eligible
7	Hawaii	Lokahi	State	1962	Eligible
8	Oahu	Hauiki Homes	State	1964	Eligible
9	Maui	David Malo Circle	Federal	1966	Not Eligible
10	Kauai	Eleele Homes	Federal	1966	Not Eligible
11	Kauai	Hui O'Hanamaulu	Federal	1966	Not Eligible
12	Maui	Kahekili Terrace (A & B)	Federal	1966	Eligible
13	Kauai	Kapaa	Federal	1966	Not Eligible
14	Oahu	Wahiawa Terrace	Federal	1966	Eligible
15	Kauai	Kalaheo Homes	Federal	1967	Not Eligible
16	Oahu	Makua Alii (Eld)	Federal	1967	Eligible
17	Hawaii	Pomaikai	Federal	1967	Not Eligible
18	Hawaii	Punahale Homes	Federal	1967	Eligible
19	Oahu	Kalanihuia (Eld)	Federal	1969	Eligible
20	Oahu	Koolau Village	Federal	1969	Not Eligible
21	Oahu	Maili I	Federal	1969	Not Eligible
22	Oahu	Nanakuli Homes	Federal	1969	Eligible
23	Oahu	Puuwai Momi	Federal	1969	Not Eligible

Organization of Report

The first section of the report summarizes the National Register eligibility criteria. The second section covers the survey scope and methodology, third is evaluation process and consideration, while the fourth is a brief history of public housing in Hawaii. Section five includes historic resource information and assessments for each of the housing projects. These include historic contexts, descriptions, maps or site plans, and one-page historic assessment photo and summary sheets. The sixth section is a summary of National Register findings and recommendations as to how to most efficiently comply with Section 106 requirements. A bibliography is provided at the end of the report.

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NATIONAL REGISTER OF HISTORIC PLACES' ELIGIBILITY CRITERIA

In order to determine the significance of a historic property, the property must be evaluated based on the National Register of Historic Places' Criteria for Evaluation. The following excerpt was taken from the National Register Criteria, Title 36 CFR, §60.4, Criteria for Evaluation:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

A. that are associated with events that have made a significant contribution to the broad patterns of our history; or

B. that are associated with the lives of persons significant in our past; or

C. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. that have yielded, or may be likely to yield, information important in prehistory or history.

National Register Bulletin No. 15, How to Apply the National Register Criteria for Evaluation provides an explanation on how to apply the criteria listed above. In summary, historic resources are evaluated by applying the four significance criteria A through D, and then determining which of the seven aspects of integrity are present to convey its significance: location, design, setting, materials, workmanship, feeling, or association.

DAVID MALO CIRCLE

DAVID MALO CIRCLE

Project	David Malo Circle
Architect	Takashi Anbe & Associates
Built	1966
National Register Eligibility	Not Eligible

Description

The David Malo Circle low cost housing project is comprised of nine duplexes, sited around a U-shaped roadway on a 1.56 acre site. It is bordered by Honoapiilani Highway and Mill Street, with access to the premises off Mill Street. The buildings are located on a flat parcel of land, and sit on poured in place, reinforced concrete slab foundations. Eight of the buildings are single story, and one, housing two four bedroom units is two stories. The eight single story duplexes vary in length, with one holding a pair of one bedroom units, two having two bedroom units, and five having three bedroom units. The central area formed by the U shaped roadway, is a park-like, open space with a lawn. The two story duplex is at the mini-park's Mill Street end, and a mature monkey pod is at the other. The rear of two three bedroom duplexes front on the "park" on either side. The buildings all feature composition shingled, double pitched hipped roofs with overhanging eaves and exposed rafter tails. The walls, originally tongue and groove, have been reinforced with T-111 on the exterior, but retain their girt. On the interior the tongue and groove partition walls remain intact. The kitchens and bathrooms have been remodeled, and jalousies have replaced the original windows. All interior doors are non-historic, and the bedroom closets have no doors. A cmu common wall separates the two side by side units in each of the duplexes.

No historic landscaping remains on the grounds, other than a monkey pod at one end of the open green space. (See Landscape Plan)



Two Stories Building



Typical Single Story Building



Open Central Area with Original Monkey Pod



Original Tongue and Groove Interior Wall

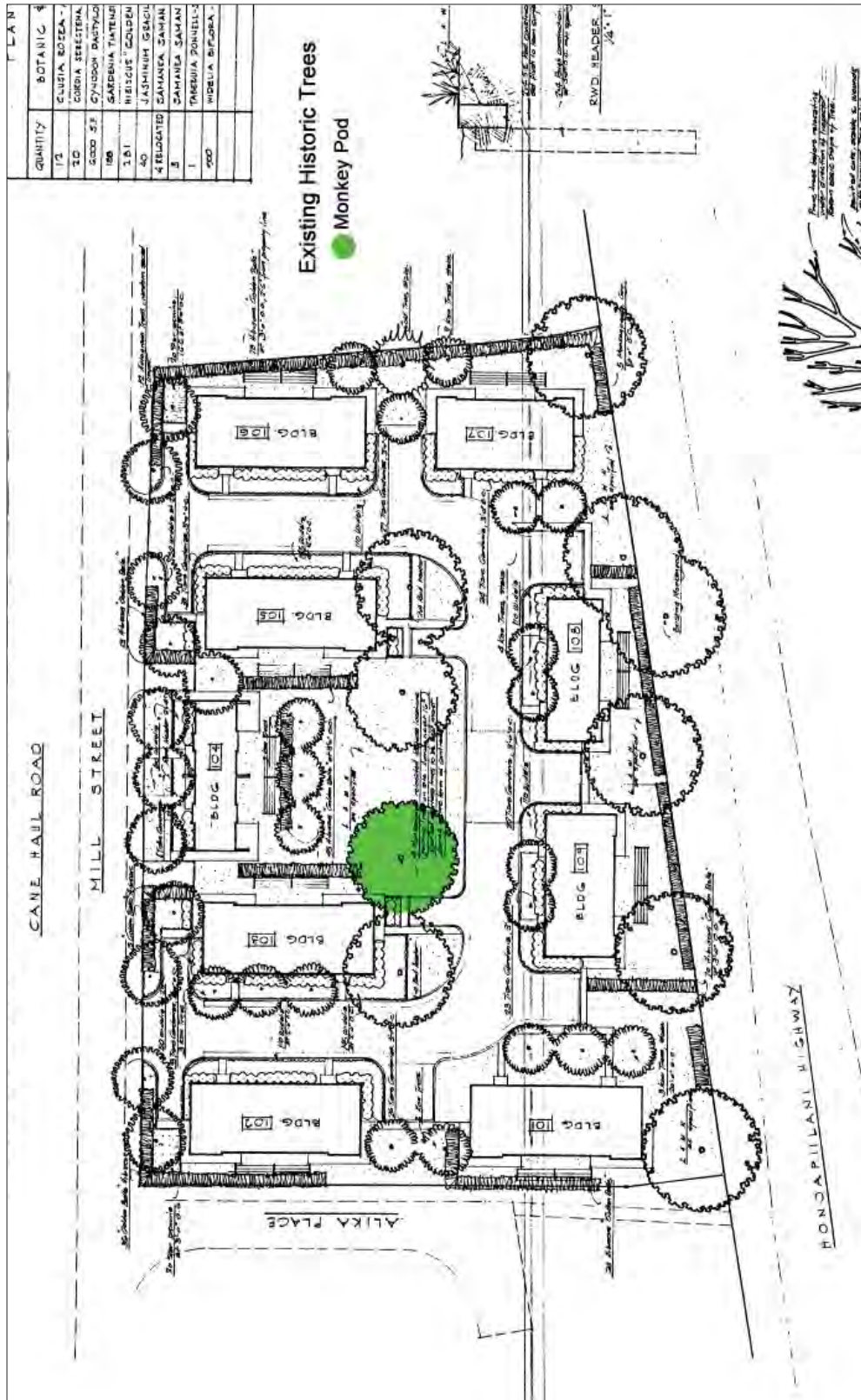


Renovated Kitchen



Jalousie Windows

DAVID MALO CIRCLE



Landscape Plan Shows Historic Trees
 Takashi Anbe & Assoc. Inc., *Landscape Plan Detail (David Malo Circle)*, Sheet 29, 1964, Hawaii Housing Authority.

History and Significance

David Malo Circle and Kahekili Terrace are the earliest known federally supported low cost housing projects on Maui. A contract for construction of the project was let in mid- 1965 to Hicks Construction Company, and in April 1966 the housing was dedicated.



Historic Photo of the Circle

This housing project is typical of the mid-to-late-1960s impetus on the part of HHA to move away from a more institutional Zeilenbau property plan and the international style of architecture to a design that more closely follows a typical suburban neighborhood form. Although an enclave unto itself, this housing project strives to integrate its design into the Lahaina community, and to be more regionally appropriate. In response to a request from the Lahaina Restoration Foundation, the HHA placed double pitched hipped roofs, or Hawaiian style roofs, on all the buildings, despite a twenty five percent higher cost for the roof and the fact that federal approval, “had been obtained with some difficulty.”²⁷ Donald H. Tokunaga, the Maui member on the

HHA board, indicated to the press, “We want to keep in line with the restoration plans and will cooperate with the [Lahaina Restoration] Foundation’s wishes provided it is within cost.”²⁸ The newspapers noted the similarity of the David Malo Circle roofs with those of the Wailuku Public Library designed by C. W. Dickey.

The architect for the project, Takashi Anbe, was born and raised on Maui, and received a degree in architectural engineering from Washington State University. Following World War II he joined Wimberly & Cook, and in 1956 opened his own office. The office later became Anbe Aruga and Ishizu, one of the more prominent firms working in Hawaii in the post-war period. Buildings by Anbe follow a clean line modern sensibility, as displayed by the King Center, the HGEA Building, and former City Bank on Queen Street, all in Honolulu, the Maui



Rendering of David Malo Circle

Prince Hotel, the Hilo State Office Building, and the Astronomy and Plant Science buildings at the University of Hawaii. In addition to David Malo Circle, Anbe also designed Kahekili Terrace for the HHA.

²⁷ Maui News, April 9, 1966.

²⁸ Maui News, October 19, 1963.

DAVID MALO CIRCLE

Nine projects were identified as embracing the informal, garden city, suburban planning precepts. These included: Lokahi Homes, Hauiki Homes, David Malo Circle, Hui o Hanamaulu, Kapaa, Eleele Homes, Kalaheo Homes, Punahale Homes, and Koolau Village. David Malo Circle, although it can be considered the work of a master and possesses distinctive double pitched hipped roofs, has had a number of alterations in addition to the application of T-111 to its exterior walls, windows and doors replacement. On the interior, the kitchens and bathrooms have been remodeled, all interior doors are non-historic, and the bedroom closets have no doors.

Although a good example of the newly emerging policy directions of the HHA, with its residential-appearing duplexes, the buildings no longer retain their integrity of materials, design or workmanship. The twelve buildings, although retaining their massing and integrity of location, have been extensively remodeled.

David Malo Circle does not appear to meet the criteria for listing in the National Register of Historic Places.

NATIONAL HISTORIC PRESERVATION ACT, SECTION 106 CONSULTATION

Demolition of David Malo Circle and Piilani Homes Project

Island	Maui
District(s)	Lahaina
TMK(s)	(2) 4-6-010:028 and (2) 4-5-007:005
Proposing Agency	Hawai'i Public Housing Authority, State of Hawai'i 1002 North King Street, Honolulu, Hawai'i 96817 Lisa Izumi, (808) 832-5374, lisa.m.izumi@hawaii.gov
Status	Comments due no later than November 7, 2024 to: rsato@bowersandkubota.com Attn: Mr. Ronald A. Sato, AICP Bowers and Kubota Consulting, Inc.; 2153 North King Street, Suite 200, Honolulu, Hawai'i 96819

The State of Hawai'i (Hawai'i), Hawai'i Public Housing Authority (HPHA) is initiating National Historic Preservation Act Section 106 consultation for the proposed Demolition of David Malo Circle and Pi'ilani Homes Project. These housing projects are located in Lahaina, Maui, Hawai'i and were severely damaged by the Lahaina wildfire of August 2023. The proposed demolition work will use federal funding provided by the U.S. Department of Housing and Urban Development (HUD) and is therefore subject to NHPA Section 106 consultation requirements. The purpose of this document is to initiate the Section 106 consultation process and obtain comments from Native Hawaiian Organizations (NHOs), interested organizations, or persons that may attach historic or cultural significance to the two housing sites.

Lihue Aerated Solids Contact Tank Improvement

Island	Kauai
District(s)	Kalapaki Ahupua'a, Puna District
TMK(s)	(4) 3-5-001:030
Proposing Agency	State of Hawaii, Department of Health, Environmental Management Division, Wastewater Branch 2827 Waimano Home Road, Rm. 207, Pearl City, HI 96782 Domciely Oda, (808) 586-4294, Domciely.Oda@doh.hawaii.gov
Status	Comments due no later than November 7, 2024 to: wwb@doh.hawaii.gov Attn: Domciely Oda Department of Health, Wastewater Branch, 2827 Waimano Home Road, Rm. 207, Pearl City, HI 96782

The Department of Health (DOH) initiated Section 106 of the NHPA consultation with the State Historic Preservation Division (SHPD) in accordance with 36 CFR Part 800. In 1990, the U.S. Environmental Protection Agency (EPA) designated the DOH to act on EPA's behalf, pursuant to 36 CFR §800.2 (c) (4), when initiating Section 106 of the NHPA process in connection with projects funded under the Hawai'i Clean Water State Revolving Fund (CWSRF). The DOH is providing funding under the CWSRF to the County of Kauai for the Lihue Aerated Solids Contact Tank Improvement. The proposed project will utilize federal Agency Action funding and is considered an undertaking, as defined by Section 106 of the NHPA, 54 U.S.C. §306101 et seq., and 36 CFR Part 800.

The undertaking consists of upgrading the aerated solids contact tank at the Lihue Wastewater Treatment Plant (WWTP) to improve service reliability within the Lihue area. The modifications to the aerated solids contact tank include replacing the existing diffusers, air piping, and effluent baffles with new equipment. The improvements also include the installation of new instrumentation and control valves. All equipment will be replaced or installed in a similar footprint to the existing equipment. All construction activities will be within the Lihue WWTP parcel (TMK (4) 3-5-001:030).

The DOH has engaged SHPD to determine the presence of potential sites of historic importance within the vicinity of the project area as well as the potential impact of the project on such sites, if present.

November 12, 2024

24A0090.00 / 24P-102

Sent via Email: kiersten@historichawaii.org

Ms. Kiersten Faulkner, Executive Director
Historic Hawai'i Foundation
680 Iwilei Road, Suite 690
Honolulu, Hawai'i 96817

Subject: National Historic Preservation Act (NHPA) Section 106 Consultation
State Hawai'i Public Housing Authority's Demolition of David Malo Circle and Pi'ilani
Homes (Island of Maui)
Tax Map Keys: (2) 4-6-010:028 and (2) 4-5-007:005
723 Mill St. and 1028 Waine'e St., Lāhainā, Hawai'i, 96761

Dear Ms. Faulkner:

Thank you for your email dated October 4, 2024, providing comments on the State Hawai'i Public Housing Authority's (HPHA) subject project as part of Section 106 consultation efforts. We have the following responses corresponding to your numbered comments.

1. We note your agreement that David Malo Circle was not eligible for listing in the National Register of Historic Places prior to the Lahaina Wildfire disaster, and there are no historic properties present with the destruction of the nine duplexes.
2. We note your agreement that Piilani Homes has lost integrity due to the Lahaina Wildfire disaster and is no longer eligible for listing in the National Register of Historic Places.
3. We concur that both housing sites are located within the Lahaina National Historical Landmark (NHL) District but were not contributing to the landmark's historic significance.
4. We confirm your agreement that the demolition of remaining structures within the two housing parcels would not have an adverse effect on historic properties.
5. HPHA would develop and comply with an approved State Historic Preservation Division archaeological monitoring plan for all demolition and ground disturbing work.
6. HPHA is still evaluating potential reconstruction options for these two housing sites which could entail reconstructing the same number and type of units as before or possibly increasing the number of units to support low-income housing in this region which may alter the prior spatial arrangement of buildings and spacing.
 - Any reconstruction or redevelopment plans developed are intended to be compatible and harmonious with the NHL character, as required by the Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties. We acknowledge that the SOI standards and guidelines address infill development in historic districts and would be considered in design plans developed.
 - The Historic Hawai'i Foundation will be included as a consulting party when reconstruction or redevelopment plans are proposed in order to assess the effect on the NHL.



Ms. Kiersten Faulkner
November 12, 2024 / 24P-102
Page 2

- HPHA has not yet decided whether to reconstruct these housing sites on their own or utilize a development partner for their redevelopment. However, the standards and guidelines addressing infill development in historic districts would be considered in selecting a development partner, as applicable.

We thank you for your interest and participation in this Project. If you have any questions, please feel free to contact me at (808) 521-5361 or by email at rsato@bowersandkubota.com.

Sincerely yours,
Bowers + Kubota Consulting, Inc.

A handwritten signature in black ink, appearing to read "Ronald A. Sato".

Ronald A. Sato, AICP
Sr. Project Manager

RS:kn

CC: Lisa Izumi, HPHA


HHF comments re HPHA Lahaina Demolition Project - Section 106 Consultation

From Kiersten Faulkner <Kiersten@historichawaii.org>

Date Fri 10/4/2024 9:24 AM

To Ty Shiramizu <tshiramizu@bowersandkubota.com>

Cc Ronald Sato <rsato@bowersandkubota.com>; 'Stephanie Hacker (stephanie.hacker@hawaii.gov)' <stephanie.hacker@hawaii.gov>; Mary Kodama (mary.kodama@hawaii.gov) <mary.kodama@hawaii.gov>

 1 attachments (5 MB)

24P084 HPHADemo_Lahaina Fire_106Letter HHF_10.03.2024.pdf;

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Aloha Ty,

Thank you for referring this undertaking to Historic Hawai'i Foundation under Section 106 of the National Historic Preservation Act.

HHF comments:

1. We agree that David Malo Circle was not eligible for listing in the National Register of Historic Places prior to the Lahaina fire. With the destruction of all nine duplexes, there are no historic properties present.
2. We agree that Pi'ilani Homes has lost integrity due to the Lahaina fire and is no longer eligible for listing in the National Register of Historic Places.
3. Both sites are located within the boundary of the Lahaina National Historic Landmark (NHL) District, but were not contributing to the historic significance of the NHL.
4. We agree that completing the demolition of all structures within the two parcels is not adverse to historic properties.
5. We agree that all demolition and ground disturbing work must comply with archaeological monitoring plans as approved by SHPD.
6. We note that the two sites are being cleared with the intention to rebuild or redevelop in the future. The letter mentions the potential for "expansion" of the housing units. We infer that the redevelopment could be different in scope, scale or spatial arrangement from the prior plan rather than a reconstruction of the lost buildings. Since these parcels are located within the NHL boundary, the parameters for any redevelopment should be compatible and harmonious with the NHL character, as required by the Secretary of the Interior's Standards for the Treatment of Historic Properties. The SOI standards and guidelines address infill development in historic districts that need to be incorporated into any future development plans. HHF requests to be included as a consulting party if and when the redevelopment plans are proposed in order to assess the effect on the NHL, if any, at that time. We recommend including both the process and the standards for infill development in a historic district as part of the HPHA selection for a development partner.

Thank you for the opportunity to comment.

Kiersten Faulkner

Kiersten Faulkner, FAICP
Executive Director
Historic Hawai'i Foundation
680 Iwilei Rd. Ste. 690
Honolulu, HI 96817
808-523-2900
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www.historichawaii.org

From: Ty Shiramizu <tshiramizu@bowersandkubota.com>
Sent: Thursday, October 3, 2024 2:07 PM
To: Member <Member@historichawaii.org>
Cc: Ronald Sato <rsato@bowersandkubota.com>
Subject: HPHA Lahaina Demolition Project - Section 106 Consultation

Aloha Ms. Faulkner,

The State of Hawai'i, Hawai'i Public Housing Authority (HPHA) is initiating National Historic Preservation Act (NHPA) Section 106 consultation for the proposed Demolition of David Malo Circle and Pi'ilani Homes Project. The proposed demolition would clear remaining structures and debris from both sites in Lāhainā, Maui, as part of recovery efforts following the wildfires that impacted the town of Lāhainā in August 2023.

Attached is a letter and enclosures provided for the purpose of gathering input from organizations, agencies, or other interested persons about the subject project. Could you please review the enclosures and submit your written comments within 30 days of receipt of this letter.

Mahalo nui for your consideration,

Ty Shiramizu, AICP

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Fax: (808) 538-7819

www.bowersandkubota.com

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