DEPARTMENT OF
HOUSING AND HUMAN CONCERNS
COUNTY OF MAUI

ALAN M. ARAKAWA
Mayor
JO-ANN T. RIDAO
Director
JAN SHISHIDO
Deputy Director

2200 MAIN STREET • SUITE 546 • WAILUKU, HAWAII 96793 • PHONE (808) 270-7805 • FAX (808) 270-7165
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January 17, 2014

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'14 JAN 27 P2:52
OFC. OF ENVIRONMENTAL QUALITY CONTROL

Director
Office of Environmental Quality Control
Department of Health, State of Hawai'i
235 S. Beretania Street, Room 702
Honolulu, Hawai'i 96813

Dear Director:

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT JOINT NEPA-CHAPTER 343
KULAMALU AFFORDABLE HOUSING
MAKAWAO DISTRICT, ISLAND OF MAUI
TAX MAP KEY: (02) 2-3-066: 012-013

With this letter, the Department of Housing and Human Concerns, County of Maui, hereby transmits the subject draft environmental assessment and anticipated finding of no significant impact for the subject project situated in Pukalani, Tax Map Key: (02) 3-3-066-012-013, in the Makawao District on the island of Maui for publication in the next available edition of the Environmental Notice.

Enclosed is a completed OEQC Publication Form, one copy of the DEA-AFONSI, an AdobeAcrobat PDF file of the same, and an electronic copy of the publication form in MS Word. Simultaneous with this letter, we have submitted the summary of the action in a text file by electronic mail to your office.

If there are any questions, please contact Mr. Wayde Oshiro in the Housing Division office at 808-270-7351 or our consultant Chester Koga at 808-842-1133 or via email at chesterk@rmtowill.com.

Sincerely,

JO-ANN T. RIDAO
Director of Housing and Human Concerns

Enclosures

AGENCY ACTIONS
SECTION 343-5(B), HRS
PUBLICATION FORM (JULY 2012 REVISION)

Project Name **Kulamalu Affordable Housing Project (Joint NEPA-343 HRS)**
Island: **Maui**
District: **Makawao**
TMK: **(2) 3-3-067-011-013**
Permits: **Building Permit, Grading and Grubbing Permit, NPDES (Stormwater) Permit**

Proposing/Determination Agency: **Department of Housing and Human Concerns**
Jo-Ann T. Ridao, Director
2200 Main Street, Suite 546
Wailuku, Hawai'i 96793
Tel: 808-270-7805

Consultant: **R.M. Towill Corporation**
Contact: Chester Koga, AICP email: chesterk@rmtowill.com
2024 N. King Street, Suite 200
Honolulu, Hawai'i 96819 Tel. 84201133

RECEIVED '14 JAN 27 P 2:52 OFC. OF ENVIRONMENTAL QUALITY CONTROL

Status (check one only):

_x_DEA-AFNSI — Submit the proposing agency notice of determination/transmittal on agency letterhead, a hard copy of DEA, a completed OEQC publication form, along with an electronic word processing summary and a PDF copy (you may send both summary and PDF to oeqchawaii@doh.hawaii.gov); a 30-day comment period ensues upon publication in the periodic bulletin.

__FEA-FONSI — Submit the proposing agency notice of determination/transmittal on agency letterhead, a hard copy of the FEA, an OEQC publication form, along with an electronic word processing summary and a PDF copy (send both summary and PDF to oeqchawaii@doh.hawaii.gov); no comment period ensues upon publication in the periodic bulletin.

__FEA-EISPN — Submit the proposing agency notice of determination/transmittal on agency letterhead, a hard copy of the FEA, an OEQC publication form, along with an electronic word processing summary and PDF copy (you may send both summary and PDF to oeqchawaii@doh.hawaii.gov); a 30-day consultation period ensues upon publication in the periodic bulletin.

__Act 172-12 EISPN — Submit the proposing agency notice of determination on agency letterhead, an OEQC publication form, and an electronic word processing summary (you may send the summary to oeqchawaii@doh.hawaii.gov). NO environmental assessment is required and a 30-day consultation period upon publication in the periodic bulletin.

__DEIS — The proposing agency simultaneously transmits to both the OEQC and the accepting authority, a hard copy of the DEIS, a completed OEQC publication form, a distribution list, along with an electronic word processing summary and PDF copy of the DEIS (you may send both the summary and PDF to oeqchawaii@doh.hawaii.gov); a 45-day comment period ensues upon publication in the periodic bulletin.

__FEIS	The proposing agency simultaneously transmits to both the OEQC and the accepting authority, a hard copy of the FEIS, a completed OEQC publication form, a distribution list, along with an electronic word processing summary and PDF copy of the FEIS (you may send both the summary and PDF to oeqchawaii@doh.hawaii.gov); no comment period ensues upon publication in the periodic bulletin.
__ Section 11-200-23 Determination	The accepting authority simultaneously transmits its determination of acceptance or nonacceptance (pursuant to Section 11-200-23, HAR) of the FEIS to both OEQC and the proposing agency. No comment period ensues upon publication in the periodic bulletin.
__Section 11-200-27 Determination	The accepting authority simultaneously transmits its notice to both the proposing agency and the OEQC that it has reviewed (pursuant to Section 11-200-27, HAR) the previously accepted FEIS and determines that a supplemental EIS is not required. No EA is required and no comment period ensues upon publication in the periodic bulletin.
__Withdrawal (explain)	

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

The Department of Housing and Human Concerns, County of Maui, proposes to construct the KulamaluAffordable Housing Project, a 64-unit multi-family housing project on 4.179 acres on tax map keys(2) 2-3-066: 012, 013, 014. A total of seven (7) two-story residential buildings will be constructed in addition to a multi-purpose building housing laundry facilities, an office and meeting facilities. Project start is schedule for the Fall 2014. The project is currently estimated to cost $9 million. The project will be partially funded using funds from the Housing and Urban Development agency.

The project site is bounded by 'Ōhi'a Ku Street and 'A'apueo Parkway, westof Kula Highway in Pukalani, Makawao District of Maui. The Universityof Hawai'i's Institute for Astronomy Maikalani Advanced Technology Research Center is located to thewest of the project site, and to the east of the project site is the Kulamalu Shopping Center. Across from'A'apueo Parkway and to the northeast of the property is a single-family residential housing area.

Joint NEPA-HEPA Draft Environmental Assessment

Kulamalu Affordable Housing

Pukalani, District of Makawao, Maui, Hawai‘i

Tax Map Key: (2) 2-3-066: 012, 013, and 014

January 2014

Prepared in Compliance with:

The National Environmental Policy Act, 42 United States Federal Code §4321 et seq., and
The Hawai‘i Environmental Policy Act, Hawai‘i Revised Statutes §343

The County of Maui
Department of Housing and Human Concerns
2200 Main Street
Wailuku, Hawai‘i 96793

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The following is a compilation comprising of a joint document prepared in compliance with the National Environmental Policy Act (NEPA), 42 United States Federal Code §4321 et seq., and the Hawaiʻi Environmental Policy Act (HEPA), Hawaiʻi Revised Statutes (HRS) §343. The use of Housing and Urban Development (HUD) funding for the proposed Kulamalu Affordable Housing project triggers the need for a NEPA environmental assessment. The project involves use of County lands and County funds, which also necessitates a HEPA environmental assessment.

This document is organized into two parts, one devoted to each Environmental Assessment. Part I of this document contains the NEPA-HUD Environmental Assessment and Part II contains the HEPA, HRS 343 Environmental Assessment.

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Part I— 42 U.S.C. §4321 Draft Environmental Assessment for HUD-funded Proposals

U.S. Department of Housing and Urban Development
Honolulu Field Office – Region IX
500 Ala Moana Boulevard, Suite 3A
Honolulu, Hawai‘i 96813-4918
www.hud.gov
espanol.hud.gov

Environmental Assessment

for HUD-funded Proposals

Recommended format per 24 CFR 58.36, revised March 2005
[Previously recommended EA formats are obsolete].

Project Identification: Kulamalu Affordable Housing
TMK (2) 2-3-066: 012, 013, 014
Pukalani, Makawao District, Maui

Preparer: County of Maui
Department of Housing and Human Concerns
2200 Main Street
One Main Plaza Building, Suite 546
Wailuku, Hawai‘i 96793

January 27, 2014

U.S. Department of Housing and Urban Development
Honolulu Field Office – Region IX
500 Ala Moana Boulevard, Suite 3A
Honolulu, Hawai'i 96813-4918
www.hud.gov
espanol.hud.gov

Environmental Assessment

Responsible Entity: County U.S. Department of Housing and Urban Development (HUD), Honolulu Field Office
[24 CFR 58.2(a)(7)]

Certifying Officer: _____
[24 CFR 58.2(a)(2)]

Project Name: Kulamalu Affordable Housing

Project Location: TMK (2) 2-3-066: 012, 013, 014

Estimated total project cost: $9 million dollars

Grant Recipient: County of Maui, Department of Housing and Human Concerns
[24 CFR 58.2(a)(5)]

Recipient Address: 2200 Main Street, One Main Plaza Building, Suite 546, Wailuku, Hawai'i 96793

Project Representative: Ms. Jo-Ann Ridao

Telephone Number: (808) 270-7805

U.S. Department of Housing and Urban Development
Honolulu Field Office – Region IX
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Conditions for Approval: *(List all mitigation measures adopted by the responsible entity to eliminate or minimize adverse environmental impacts. These conditions must be included in project contracts and other relevant documents as requirements). [24 CFR 58.40(d), 40 CFR 1505.2(c)]*

None.

FINDING: [58.40(g)]

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

_____ **Finding of Significant Impact**
(The project may significantly affect the quality of the human environment)

Preparer Signature: _____ **Date:** _____

Name/Title/Agency: _____

RE Approving Official Signature:

_____ **Date:** _____

Name/Title/Agency: _____

Statement of Purpose and Need for the Proposal: [40 CFR 1508.9(b)]

The County of Maui (CoM), Department of Housing and Human Concerns (DHHC), proposes to construct Kulamalu Affordable Housing in Pukalani, Makawao District, on the island of Maui. The work is being undertaken by CoM, DHHC in response to the demand for affordable multi-family housing on Maui.

Maui's population is anticipated to continue to grow at a rate of 2.2 percent per year[1], outpacing housing supply, resulting in approximately 10,845 units of unmet housing demand[2]. A large and growing demand for affordable housing exists because a substantial portion of all CoM households pay more than 30 percent of their income on housing. By definition, *affordable* housing should be priced below 30 percent of median area household income[3]. When households spend 30 percent or more of their income on housing, they are considered cost burdened and therefore potentially less able to purchase basic necessities such as food, clothing, transportation and medical care. In 2011, 48.2 percent of CoM households devoted 30 percent or more of their income on housing. Within the Makawao-Pukalani-Kula Census Tract Districts (cdts), the figures are more pronounced. According to HUD income guidelines, approximately 83.1 percent or approximately 7,606 households in the Makawao-Pukalani-Kula cdts paid 30 percent or more of their income on housing in 2011. Conversely, only 16.9 percent or approximately 1,547 households among Makawao-Pukalani-Kula cdts' total households (9,154) paid 30 percent or less of their income on housing in 2011[4].

Description of the Proposal: Include all contemplated actions which logically are either geographically or functionally a composite part of the project, regardless of the source of funding. [24 CFR 58.32, 40 CFR 1508.25]

The applicant, CoM, DHHC, proposes to construct Kulamalu Affordable Housing (KAH), an affordable multi-family housing project on a CoM-owned 4.179-acre parcel. This project will consist of seven two-story residential structures with 64 housing units, a community center, 128 parking stalls, one loading zone, and two concrete driveways connecting the project with 'Ōhi'a Ku Street. Each of the 64 multi-family housing units will vary in size from 592 and 812 square feet (sf), the majority residential units will possess private lanais. Available unit types will range from one bedroom/one bathroom to two-bedroom/one-bathroom. The community center will be a 3,036 sf multi-purpose single story structure and will house a common washer dryer facility, a maintenance storage area, and a leasing agent/manager's office. Additional space is available

[1] 2011. SMS. County of Maui. *Hawai'i Housing Planning Study*.
Retrieved from: http://www.co.maui.hi.us/index.aspx?NID=1826
[2] 2012, March. State of Hawai'i Department of Business, Economic Development and Tourism (DBEDT). *Population and Economic Projections for the State of Hawai'i to 2035: DBEDT 2035 Series, July 2009 (Revised)*.
[3] 2013, May 9. Housing and Urban Development. *Affordable Housing.*
Retrieved from: http://www.hud.gov/offices/cpd/affordablehousing/
[4] 2011. SMS. *Hawai'i Housing Planning Study*.
Retrieved from: http://www.co.maui.hi.us/index.aspx?NID=1826

within the community center for other uses such as day care. The community center building also features two large covered lanais.

The project site will be landscaped with open areas interspersed near each of the buildings, hedge landscaping and fencing will enclose the property from the surrounding streets and will complement the existing trees in the sidewalk tree wells. Parking facilities will be located within the center of the project. The building setback will be at least forty linear feet (lf) from the project site boundaries. See *Figure 1, Sheet A-1, Proposed Kulamalu Affordable Housing,* and *Figure 2, Sheet A-2, Proposed Kulamalu Affordable Housing Multi-Purpose/Community Center Building*.

Planned utilities for the proposed project will involve the construction of sewer, and water mains that will connect to existing six inch and eight-inch mains on ‘Ōhi‘a Ku Street, and the intersection of ‘Ōhi‘a Ku and ‘Ōhi‘a Lehua Street. Electrical utilities will also be constructed for the proposed project.

Existing Conditions and Trends*: Describe the existing conditions of the project area and its surroundings, and trends likely to continue in the absence of the project. [24 CFR 58.40(a)]*

The proposed project area is likely to continue to experience growth in urban development. KAH is located in an area is characterized by a mixture of rural and suburban uses. The proposed project is located within the State Land Use designation “Urban” and the CoM zoned “County Town Business” district. There are several nearby existing and planned single and multi-family residential developments. All adjacent parcels are currently in urban use. KAH is a permitted use within both State and County land use designations. The proposed project site and the adjacent properties are part of the 53.67 acre Kulamalu Town Center Subdivision (also known as the Kulamalu Commercial Subdivision).

The proposed project site is bordered in the north by ‘A‘apueo Parkway and in the northwest there is a private residential housing development. To the west is ‘Ōhi‘a Ku Street and beyond is the University of Hawai‘i’s Institute for Astronomy Maikalani Advanced Technology Research Center. To the east, the land appears vacant and covered with non-native grasses similar to the project site. To the east of Kupaoa Street is the Kulamalu Town Center.

Nearby schools include the Kamehameha Maui School Campus, the University of Hawai‘i’s Institute for Astronomy Maikalani Advanced Technology Research Center, and King Kekaulike High School.

The closest commercial/retail facilities to the proposed project site are the Kulamalu Shopping Center and the Pukalani Terrace Shopping Center.

The nearest major arterial road is the Kula Highway, State Route 37, which provides access to the proposed Kulamalu Affordable Housing project. The Kula Highway is located to the east of the project site and has two lanes with a posted speed limit of 45 miles per hour (mph). The highway begins at the juncture of Haleakalā Highway and Haleakalā By-Pass Highway, connecting the Pukalani area with Kahului to the northwest. The Kula Highway also connects with the Pi‘ilani Highway (State Route 31), and Haleakalā Highway (State Route 377), providing

eastern Maui with access to the nearby regions. ‘Ōhi‘a Ku Street is the only roadway directly accessible to the project, and it has two-lanes and a posted speed of 30 mph.

Bus service is provided to the area by the Maui Public Bus Transit System, Upcountry Islander Route #40 and the Kula Villager Route #39, and by the Maui Bus-Commuter Service, Haiku – Wailea Commuter Route.

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Statutory Checklist

[24CFR §58.5]

Record the determinations made regarding each listed statute, executive order or regulation. Provide appropriate source documentation. [Note reviews or consultations completed as well as any applicable permits or approvals obtained or required. Note dates of contact or page references]. Provide compliance or consistency documentation. Attach additional material as appropriate. Note: conditions, attenuation or mitigation measures required.

Factors	Determination and Compliance Documentation
Historic Preservation [36 CFR 800] ***See Appendix A, Exhibit A***	Two archaeological studies were conducted within the Kulamalu Commercial Subdivision. Several significant historical sites were documented (SIHP 50-50-10-1061 and 1062; SIHP 50-50-10-4179; 50-50-10-5479; 50-50-10-4180; 50-50-10-5769; 50-50-10-5470; 50-50-10-2920; 50-50-10-1231; 50-50-10-1264; 50-50-10-5173). The Department of Land and Natural Resources (DLNR), State Historic Preservation Division (SHPD), was contacted on September 13, 2013 to verify/validate whether the proposed project site contains historical remains. A response was received from the DLNR-SHPD, Maui Office on September 19, 2013. The response provided descriptions of documented sites none of which have been indicated as located on the proposed project site. A letter of response was sent to the DLNR, SHPD, Maui Office on October 21, 2013, acknowledging the receipt of their letter. In order to mitigate the possibility of adversely impacting unrecorded historical remains, an archaeological monitor will be present to observe ground altering activities, such as trenching and site grading for the proposed project, excluding areas that have had excessive cuts and fill.

Factors	Determination and Compliance Documentation
Floodplain Management [24 CFR 55, Executive Order 11988] ***See Appendix A, Exhibit B***	According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Map Number 150003INDOB (revised September 25, 2009), the project site is located in an area designated as Flood Zone X[5]. The Zone X designation denotes an area of minimal flooding and low flooding risk and is used to denote areas located outside the 100-year floodplain[6].The proposed project is not expected to be impacted based on its location within the Zone X designation.
Wetlands Protection [Executive Order 11990] ***See Appendix A, Exhibit C***	According to the National Wetlands Inventory map from the Department of the Interior, U.S. Fish and Wildlife Service (USFWS), there are no wetlands on the subject property[7]. A request for determination was sent on August 13, 2013 to the U.S. Army Corps of Engineers (USACE), Honolulu Engineer District, Regulatory Branch for confirmation that there are no wetlands on the subject property. A response was received on September 10, 2013, confirming that Department of the Army (DA) permit is not required for Section 404 of the Clean Water Act because the project site "consist entirely of uplands and absent of water of the U.S." A letter was sent on October 21, 2013, acknowledging the receipt of the USACE letter dated September 10, 2013.
Coastal Zone Management Act [Sections 307(c),(d)] ***See Appendix A, Exhibit D***	The Coastal Zone Management Act is administered by the Hawai'i Office of Planning in accordance with Chapter 205A of the Hawai'i Revised Statues (HRS), and sets forth the state's Coastal Zone Management Program. A request for a Hawai'i Coastal Management (CZM) Program federal consistency review was sent to the State of Hawai'i, Office of Planning (OP), Coastal Zone Management Program for confirmation. On August 19, 2013, the State of Hawai'i, Office of Planning sent a response stating that "the Hawai'i CZM Program does not review any HUD assistance programs, grants or loans for federal consistency in

[5] U.S. Federal Emergency Management Agency. Map Service Center. *Definitions of FEMA Flood Zone Designations.* Retrieved from: https://msc.fema.gov/webapp/wcs/stores/servlet/info?storeId=10001 &catalogId=10001&langId=1&content=floodZones&title=FEMA%2520Flood%2520Zone%2520Designations
[6] *Ibid*.
[7] U.S. Fish and Wildlife Services. *Wetlands, Data Mapper.* Retrieved from: http://www.fws.gov/wetlands/data/mapper.html

Factors	Determination and Compliance Documentation
	accordance with Section 307(d) of the Coastal Zone Management Act and 15 CFR Part 930. There are no HUD assistance programs subject to consistency review, pursuant to 15 CFR §930.95." A letter of response was sent to the OP on October 21, 2013, acknowledging the receipt of their letter dated August 19, 2013.
Sole Source Aquifers [40 CFR 149] ***See Appendix A, Exhibit E***	No Sole Source Aquifers are located on the island of Maui as defined by 40 CFR 149.
Endangered Species Act [50 CFR 402] ***See Appendix A, Exhibit F***	The proposed project site contains non-native grasses and shrubbery and no trees. There are no known listed, threatened or at-risk species present on the proposed project site. A letter of confirmation was sent on August 13, 2013 to the USFWS, Pacific Islands Fish and Wildlife Office for confirmation. A response was received from USFWS-Pacific Islands Fish and Wildlife Office on September 11, 2013, stating that there are endangered and threatened species that may be impacted by the project and suggested mitigation measures for each of the potentially impacted endangered species. These include: • Hawaiian Hoary Bat (endangered): Do not remove or trim woody plants greater than 15 feet tall during the Hawaiian hoary bat breeding season, June 1 to September 15. • Blackburn's Sphinx Moth (endangered): A biological survey must be conducted during the rainy season (usually November-April), approximately 4-6 weeks following a significant rainfall event, to determine if there are eggs, larvae, and signs of larval feeding. If the presence of the Blackburn's sphinx moth is confirmed, the USFWS should be contacted for further guidance. The resumption of any work, or after any subsequent delay of work of three or more days (during which the birds may attempt to nest.) If a nest is discovered within a radius of 150 feet of proposed construction work, or a previously undiscovered nest is found within said radius after work begins, all work must cease immediately and the Service contacted for further guidance. • The Hawaiian petrel and Newell's shearwater (threatened): Project related outdoor artificial lighting such as flood lighting for construction work, security, and outdoor illumination will be minimized.

Factors	Determination and Compliance Documentation
	• Hawaiian Goose (endangered): If a Hawaiian goose appears within 100 feet of ongoing construction work, all activity shall be temporarily suspended until the bird moves off to a safe distance of its own volition. If any number of Hawaiian geese are observed loafing or foraging during the Hawaiian good breeding season (October through April), a biologist familiar with the nesting behavior of the Hawaiian goose should survey in and around the proposed construction footprint prior to construction. A letter was sent on October 21, 2013, acknowledging the receipt of the USFWS-Pacific Islands Fish and Wildlife Office comments received on September 11, 2013. Mitigation measures for potentially impacted endangered and threatened species set forth by the USFWS will be pursued where necessary. USFWS will be contacted if signs of the Hawaiian Hoary Bat, Blackburn's Sphinx Moth, and the Hawaiian goose are found and construction will be halted until further instructions are received from UFWS. Project related artificial outdoor lighting will be minimized in order to mitigate any potential impacts on the Hawaiian petrel and Newell's shearwater. The CoM will request that the contractor implement mitigation strategies to minimize the potential impacts of invasive species introduction and transport due to the advent of construction-related materials and heavy vehicles into the action area during the construction phase of the proposed project. Therefore a biosecurity assessment will not be required.
Wild and Scenic Rivers Act [Sections 7 (b), (c)] ***See Appendix A, Exhibit G***	There are no federally designated wild and scenic rivers in the State of Hawai‘i as defined by 16 USC 1271-1287, Public Law 90-542.
Air Quality [Clean Air Act, Sections 176 (c) and (d), and 40 CFR 6, 51, 93]	Air quality throughout the State of Hawai‘i is relatively high and is attributed in part to the consistent trade winds that quickly dispense concentrations of emissions. The state maintains 14 air monitoring stations on three (3) islands: O‘ahu, Hawai‘i and Maui. Using data collected from these monitoring stations in 2012, the entire State of Hawai‘i was found in attainment of the National Ambient Air Quality Standards established under the Clean Air Act[9].

[9] 2013. State of Hawai‘i, Department of Health.Retrieved from: http://emdweb.doh.Hawai‘i .gov/air-quality/

Factors	Determination and Compliance Documentation
	In conformance with the Clean Air Branch's Standard Comments[10], the CoM will advise the contractor to implement mitigation measures through BMPs to specifically control fugitive dust. These BMPs may include: • Planning the different phases of construction, focusing on minimizing the amount of 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 dust from shoulders and access roads; • Providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and • Controlling dust from debris being hauled away from the project site[11].
Farmland Protection Policy Act [7 CFR 658]	The proposed project is an infill development located within the State Land Use "Urban" designation and the CoM's "County-Business Town" district, and is situated within an area with established urban residential and small-scale rural service/commercial centers. The project site itself and adjacent areas have not been in agricultural use for several decades. Because the proposed project does not propose to alter existing land use patterns or State and CoM zoning, it will not adversely impact farmlands.
Environmental Justice [Executive Order 12898]	All persons who are eligible to rent or purchase housing units at the proposed project will be evaluated fairly. The proposed project will enhance the quality of life for families by providing an opportunity to access affordable housing. The proposed KAH will not expose its residents or the residents of Pukalani to adverse health, environmental or economic effects.

[10] Clean Air Branch, Department of Health, State of Hawai'i. *Standard Comments*. Retrieved from: http://health.hawaii.gov/epo/files/2013/05/CAB-standardcomment.pdf
[11] *Ibid*.

HUD Environmental Standards Determination and Compliance Documentation	
Noise Abatement and Control [24 CFR 51 B] ***See Appendix A, Exhibit H***	The proposed project site is located in an area comprised of residential and small-scale commercial lots. There are no significant fixed noise generators in the vicinity of the project site. The proposed project will also not involve the development of fixed noise generators. The predominant existing background noise source closest to the proposed project site is attributable to vehicles traveling along the nearby Kula Highway and other existing roadways. During construction of the proposed project noise will be generated, however, it is expected to be short-term in duration. All internal combustion equipment will be muffled in accordance with standard engine operating practices. If equipment used during construction generates noise higher than allowed by the State of Hawai'i Noise Code, a Noise Permit from the State of Hawai'i Department of Health will be obtained.
Toxic/Hazardous/ Radioactive Materials, Contamination, Chemicals or Gases [24 CFR 58.5(i)(2)] ***See Appendix A, Exhibit I***	The proposed project site is currently vacant and was used in the distant past for agricultural uses, though not for sugarcane production. Based on a review of historical records and government documents of the subject property, there are no known environmental conditions on-site that will adversely affect using this site for a residential shelter, or could adversely impact the health and safety of the occupants. If any substance or material listed in 24 CFR 58.5(i)(2) is visibly present at the site, a DOH-approved environmental monitor will be present for all ground-altering activities. A request for determination was sent on August 13, 2013, to the Environmental Protection Agency (EPA) Region 9 for confirmation. A response was received on August 23, 2013 from the State of Hawai'i, Department of Health (DOH) stating that the CoM, DHHC is required to adhere to all Standard Comments[12] and recommendations were also put forth for following strategies and principles on sustainability. A letter of response was also received from the DOH, Maui

[12] Hazard Evaluation and Emergency Response Office. Department of Health. State of Hawai'i. *Standard Comments*. Retrieved from: http://health.hawaii.gov/epo/files/2013/05/HEER-standardcomment.pdf

HUD Environmental Standards Determination and Compliance Documentation	
	District Office, on August 28, 2013, strongly recommending reviewing the Standard Comments at the Department's website. A letter was sent on October 21, 2013, acknowledging the receipt of and addressing the DOH and Maui District Office comments received on September 11, 2013. The letter dated October 21, 2013 also addresses the Standard Comments for HEER by disclosing the history of land use on the proposed project and that it does not include any listed toxic, hazardous, radioactive materials, contamination, chemicals or gases. If any 24 CFR 58.5(i)(2) listed substance or material is visibly present at the site a DOH-approved monitor will be present for all ground-altering activities. Eight aboveground storage tanks (AST) containing propane gas were observed in three locations during a foot-survey that was recently performed within a one-mile radius of the project site. Four AST are located at King Kekaulike High School, two tanks are located at the Pukalani Superette, and two tanks are located at the Kamehameha Schools Maui Campus. Each of the ASTs within a one-mile radius of the proposed project are in compliance with the HUD Acceptable Separation Distance (ASD).
Siting of HUD-Assisted Projects near Hazardous Operations [24 CFR 51 C] ***See Appendix A, Exhibit J***	Based on a review of historical records and government documents of the subject property, there are no known environmental conditions on- or off-site that will adversely affect using this site for a residential shelter, or could adversely impact the health and safety of the occupants. An ASD Analysis has been prepared and is included in the Appendix as *Exhibit J*. Results of the ASD Analysis conclude that each of the ASTs within the 1-mile radius of the proposed project site are in compliance with the HUD ASD.
Airport Clear Zones and Accident Potential Zones [24 CFR 51 D] ***See Appendix A, Exhibit K***	The existing land uses at and near the project location are not designated Runway Clear Zones (for civil airports), or Clear Zones and Accident Potential Zones (military airfields) in accordance with FAR Part 77. Furthermore, the project is not located within 2,500 feet of the end of a civilian airport runway or 15,000 feet of the end of a military airfield runway in accordance with HUD website Environmental Review Requirements[13]. The civilian airport located closest to the project site is Kahului Airport, which is located approximately

[13] U.S. Department of Housing and Urban Development. *Airport Clear Zones*. Retrieved from: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/environment/review/airport

HUD Environmental Standards Determination and Compliance Documentation	
	11 miles or 58,000 feet away. The proposed structures for the Kulamalu Affordable Housing will not impact airport clear zones and accident potential zones.

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Environmental Assessment Checklist

[Environmental Review Guide HUD CPD 782, 24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Evaluate the significance of the effects of the proposal on the character, features and resources of the project area. Enter relevant base data and verifiable source documentation to support the finding. Then enter the appropriate impact code from the following list to make a determination of impact.

Impact Codes: (**1)** - No impact anticipated; (**2)** - Potentially beneficial; (**3)** - Potentially adverse; (**4)** - Requires mitigation; (**5)** - Requires project modification. Note names, dates of contact, telephone numbers and page references. Attach additional material as appropriate. Note conditions or mitigation measures required.

Land Development	Code	Source or Documentation
Conformance with Comprehensive Plans and Zoning	**1**	The proposed project is in conformance with the requirements, goals, and recommendations of the 1) Hawai'i State Planning Act, Chapter 205; 2) The State of Hawai'i Coastal Zone Management Program; 3) The Maui General Plan 2030, and; 4) The Makawao-Pukalani-Kula Community Plan (1996), and CoM zoning.
Compatibility and Urban Impact	**2**	The proposed project is an urban infill development that will increase the supply of affordable housing in the Upcounty Maui region. The project site is located in close proximity to single-family and multi-family residential areas, and several schools. The development of the proposed project will improve a vacant, sparsely vegetated, unused site by adding additional greenways to the neighborhood landscape while providing in-demand affordable housing units for the community.
Slope ***See Appendix A, Exhibit L***	**1**	Slope variations in east and west banks average 30-50 percent and a relatively flat area in the middle averages at less than 5 percent. Slopes east to west average 10-15 percent.
Erosion	**1**	Although the proposed project site does not have any indication of erosion problems, the project will comply with applicable storm water runoff provisions in accordance with the State Department of Health and County of Maui Drainage Standards. See Chapter 11-54, Water Quality Standards, Chapter 11-55, Water Pollution Control, Hawai'i Administrative Rules (HAR); and Rules Relating to Soil Erosion Standards and Guidelines, Department of Public Works, County of Maui.

Land Development	Code	Source or Documentation
		During the construction of the proposed project, the CoM will recommend that the contractor implement Best Management Practices (BMPs)s to prevent runoff from leaving the project site. Construction BMPs may include but are not limited to: 1. Prevention of cement products, oil, fuel, and other toxic substances from falling or leaching into storm water runoff. 2. Prompt and proper disposal of all loosened and excavated soil and debris materials from drainage structure work. 3. Retention of ground cover until the last possible date. Stabilization of denuded areas by sodding or planting as soon as possible. 4. Solid waste is to be disposed of at a County approved facility.
Soil Suitability ***See Appendix A, Exhibit M***	**1**	Underlying the proposed project site are soils belonging to the Waiakoa-Keahua-Molokaʻi association, consisting of moderately steep, well-drained soiled that have moderately fine textured subsoil located on low uplands. The specific soil type underlying the project site is Keahua cobbly silty clay (KnhC), which has 7 to fifteen 15 percent slopes. With its slow to moderate runoff and slight to moderate erosion hazard.
Hazards and Nuisances including Site Safety ***See Appendix A, Exhibit N***	**1**	The proposed project area is not adversely affected by hazards or nuisances because it is not located within a high risk flood zone and well outside the tsunami inundation zone. There will be adequate on-site parking for the proposed project which will mitigate the potential for overflow parking. All necessary site safety precautions undertaken will be pursuant to current standards prescribed by law or professional recommendation. A letter of consultation was sent to CoM Police Chief, Mr. Gary Yabuta, on August 13, 2013 to solicit input about any potential safety issues that may need to be taken into consideration for the proposed project. A letter of response was received on September 13, 2013 from Chief Yabuta, with an enclosed statement provided from Officer Marjorieann L. Kahookele-Pea. Officer Kahookele-Pea's statement, dated September 3, 2013, discussed the potential need for expanded police protection to maintain the safety of additional pedestrians and vehicles in the Kulamalu Area. Additional mitigative suggestions involved looking into the possibility of developing an alternative exit/entry

Land Development	Code	Source or Documentation
		into the Kulamalu Area in order to avoid traffic associated with Kamehameha Schools and a proposed elderly housing development in the project area. A letter was sent to Officer Kahookele-Pea's on October 21, 2013, affirming that the Environmental Assessment will address all necessary and feasible precautions to ensure that pedestrian and vehicular traffic will not impose an additional burden on police enforcement in the area. Expanding police enforcement is however outside of the purview of the CoM, DHHC's authority. Furthermore, due to budgetary constraints of the proposed affordable housing project, it is infeasible to construct an alternative intersection to the 'A'apueo Parkway and Kula Highway.
Energy Consumption	**1**	The proposed project will involve the short-term commitment of fuel for equipment, vehicles, and machinery during construction activities. Upon project completion, electrical, water and sewer service will be provided to the KAH multi-family units. Resident will also be encouraged to use the existing bus service to minimize the potential impacts of air pollution. Overall, energy consumption is not likely to negatively impact the project area. The proposed project will not utilize an inordinate amount of energy because the units will be constructed in accordance with the CoM Energy Conservation Code, and the design of the units will utilize high energy efficiency measures, such as installation of Energy Star certified appliances, solar water heaters, low-flow water fixtures and compact fluorescent lamps.
Noise - Contribution to Community Noise Levels	**1**	Ambient noise conditions may be temporarily affected by construction-related activities. Mitigation measures for construction-related noise generation will include but not be limited to the use of proper equipment and regular vehicle maintenance. Equipment mufflers or other noise attenuating equipment may also be employed as required to reduce noise levels. Noisy construction activities will be restricted to the hours between 8:30 a.m. and 4:30 p.m., Monday through Saturday, excluding holidays. By effectively employing these measures, potential noise-related impacts from construction-related activities may be mitigated. After construction, the proposed KAH will minimally contribute to community noise levels during peak hours of travel time during the weekdays whereby a maximum of 128 vehicles will be added

Land Development	Code	Source or Documentation
		to the road. For residential-specific mitigative measures, covenants will be enacted to restrict admissible noise levels generated by residents. A property manager will be on-site to enforce these noise-related covenants.
Air Quality Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels	**1**	The proposed project is not anticipated to have an adverse effect on air quality in the region due to existing environmental conditions and the non-polluting nature of the project itself. The CoM will recommend that the contractor implement mitigative measures to minimize the proposed project's impact on air pollution.
Environmental Design Visual Quality - Coherence, Diversity, Compatible Use and Scale	**1**	The proposed project is compatible with the neighborhood surroundings and is not anticipated to significantly impact the scenic and open space resources of the area. The project site is an urban infill development, whereby multiple housing tracts exist to the northeast, south east, and north west of the project site. There is also a small shopping center to the east of the project site. KAH has been designed with a mass, scale and overall appearance to conform to the character of the neighborhood. The proposed seven buildings will be no more than two stories and 35 feet in height, and comprise no more than .2 acres (8,700 square feet). The ratio of the built environment (buildings, driveways and parking stalls) to the landscaping will be approximately 60:40. For these reasons, KAH is a concentrated residential development that maximizes the use of landscaping and strives to maintain the rural nature of the Upcountry Maui region.

Socioeconomic	Code	Source or Documentation
Demographic Character Changes	**1**	KAH is not anticipated to adversely change the demographic characteristics of the proposed project area. KAH, however, is anticipated to accommodate some of the local demand for affordable housing for existing residents in the Upcountry region. Any increase in population associated with the proposed project will be within expected growth parameters of the Maui General Plan 2030.
Displacement	**1**	There will be no displacement of residences or businesses as a result of the proposed action because the project site is currently vacant.
Employment and Income Patterns	**2**	Local construction and construction-related employment may be supported in the short-term. Accordingly, the project may have the possibility to create a beneficial impact on the local economy during the period of construction. Over the long-term, KAH residents will positively contribute to the local economy by purchasing nearby goods and services.
Educational Facilities ***See Appendix A, Exhibit O***	**1**	The proposed project will have a minimal impact of existing educational facilities in the region. Preliminary comments were received by the Department of Education (DOE) on August 29, 2013 in response to a consultation letter for the proposed project sent on August 13, 2013. There is sufficient space in the DOE schools that serve Pukalani to accommodate students who will live in the project.
Commercial Facilities	**2**	The Proposed project is limited in scope to the construction of 64 multi-family residential units and is not anticipated to adversely affect commercial facilities in the project vicinity. The commercial facility located in closest proximity to the project site is Kulamalu Shopping Center, which may potentially see increases in patronage as a result of the proposed action.

Community Facilities and Services	Code	Source or Documentation
Health Care	**1**	The proposed project will not increase the area's population outside of the projected growth parameters for CoM and this will not create a significant new demand for medical services. The Kula Hospital and Clinic is the most comprehensive medical facility located closest to the project site. It offers on-site emergency, geriatric care, outpatient, and urgent care services, as well as limited off site rural emergency care services. A handful of dental practices are located in Pukalani and the neighboring towns of Kula and Makawao. The island's only major medical facility offering a wide array of services is the Maui Memorial Medical Center in Wailuku, which is approximately 13 miles northwest of the proposed project site. It is licensed for over 200 beds, and provides care services such as acute, emergency, general, obstetric, rehabilitation, and cancer treatment.
Social Services	**2**	The proposed project will not negatively affect social services. KAH will generate a social welfare benefit through the provision of affordable housing in the Upcountry region, and may potentially lessen the need for rent assistance.
Solid Waste ***See Appendix A, Exhibit P***	**1**	On a short-term basis, construction activities will require the disposal of construction-related solid waste at the Central Maui landfill. The CoM, DHHC will recommend that the contractor minimize the amount of solid waste generated during the construction of the project by developing a construction waste management plan in coordination with the Department of Environmental Management, Solid Waste Division prior to the commencement of construction activities. As appropriate, Maui Demolition & Construction (D&C) Landfill, a privately owned and operated, Decoite, Inc.[14], will be utilized by the contractor for the disposal of construction waste materials. In the long-term, solid waste collection for the project will be provided by a commercial waste disposal service. Upon the project's completion, it is not anticipated to significantly impact the long-term capacity of the County's Central Maui Landfill.

[14]2009, February 17. Prepared for County of Maui, Department of Environmental Management Solid Waste Division by Gershman, Brickner & Bratton, Inc. *Integrated Solid Waste Management Overview*. Retrieved from: http://www.co.maui.hi.us/documents/11/29/93/Overview%20of%20final%20ISWMP.PDF

Community Facilities and Services	Code	Source or Documentation
Waste Water ***See Appendix A, Exhibit P***	**1**	The project site currently does not generate any wastewater because it is undeveloped. It is anticipated that once constructed, the proposed project will generate approximately 12,800 gpd[15] of wastewater. Wastewater generated from the project will go to the project's sewer collection system that will connect to a Hawai'i Water Services facility and will be handled appropriately thereafter.
Storm Water	**1**	There will be no adverse effects to adjacent or downstream properties as a result of the proposed project. The incremental increase in post-development runoff will be transported via grassed swales to drain inlets which tie into the existing drainage systems.
Water Supply ***See Appendix A, Exhibit Q***	**1**	Three existing ¾–inch water meters already service the project site. In accordance with Department of Water Supply (CoM, DWS) meter sizing requirements, the meters may have to be upsized and/or consolidated to meet flow requirements of the project, but cannot exceed the cumulative allowable CoM, DWS maximum assigned allocation of 20,895 gpd. The project's estimated usage ranges between 15,000 to 18,000 gallons per day (gpd) on average with peak days at 18,000 to 20,000 gpd. Recent water quantity and quality testing confirms adequate capacity and good quality of drinking water sources in the Makawao-Kula-Pukalani District.
Public Safety **- Police**	**1**	See the *Environmental Checklist, Land Development, Hazards and Nuisances including Site Safety*.
Public Safety **— Fire** ***See Appendix A, Exhibit R***	**1**	Fire prevention, suppression, and protection services for the Makawao-Pukalani-Kula cdt's is provided by the CoM Department of Fire and Public Safety's Makawao Fire Station, located in Makawao less than two miles from the proposed project. As with police protection, fire protection service requirements are not anticipated to be adversely affected by the proposed project. The proposed project is an infill development

[15] Estimate is based on the 6,000 gallon per month ceiling charge for multi-family housing dwellings. This amount is multiplied by the number of units (64) that will be constructed at Kulamalu Affordable Housing. Source: County of Maui Department of Environmental Management Wastewater Services Information. Retrieved from: http://www.mauicounty.gov/index.aspx?NID=808

Community Facilities and Services	Code	Source or Documentation
		and will not extend service area limits for fire protection services. A letter of confirmation was sent on August 13, 2013 to the CoM Fire Department and Public Safety for determination. A response was received on August 30, 2013 from the Fire Prevention Bureau (FPB) stating that the preliminarily estimated fire flow for the proposed project may range between 1500 GPM's to 2000 GPM's, depending on the approach of the fire protection. The CoM will also be under a new fire code as of June 2014 which all newly constructed projects must adhere to. The FPB will provide official comments to the Draft Environmental Assessment (DEA). A letter was sent on October 21, 2013 to address the FPB comments. All suggested mitigative measures will be followed to ensure that KAH complies with the current CoM fire code.
Public Safety **— Emergency Medical**	**1**	The proposed project is not anticipated to adversely affect emergency medical services. Maui Memorial Medical Center, the island's only acute care facility, is located in Kahului, approximately thirteen miles away from the project site. As an urban infill project, the development will not extend service area limits for emergency medical services.

Community Facilities and Services	Code	Source or Documentation
Open Space and Recreation **—Open Space** ***See Appendix A, Exhibit S***	**2**	In addition to the open space resources within the project, there are several nearby park resources. The Mayor Hannibal Tavares Community Center and Upcountry Pool, and the Harold Rice Park, CoM-owned and operated facilities, are located within two miles, and five miles respectively of the project site. The Mayor Hannibal Tavares Community Center and Upcountry Pool is twenty acres and offers an aquatic center, baseball/softball fields, basketball courts, a community center, locker rooms, parking, restrooms, a soccer field, telephones, tennis courts and water. The Harold Rice Park is 3.8 acres and offers parking, picnic tables, restrooms, telephones and water. The proposed project is not anticipated to place any significant new demands on recreational activities. A letter of confirmation was sent on August 13, 2013 to the State of Hawai‘i, Department of Parks and Recreation (DPR) for determination. A response was received from CoM, DPR on September 16, 2013 stating that the proposed project will be subject to park assessment fees, totaling $318,720 for the project, with $4,980 charged for each housing unit during the 2013-2014 fiscal year. These fees remain in effect until June 30, 2014 and are subject to change thereafter. Furthermore, the applicant is required to satisfy the applicable park dedication requirements in effect at the time of issuance of the building permit. A letter of response was sent to CoM, DPR on October 7, 2013 stating that the proposed project is a HUD-funded affordable housing project and CoM, DHHC will request an exemption of fee requirements per the Maui City Code 18.16.320I.1 and 5[17]. CoM, DPR sent a follow up response on October 17, 2013 stating that Kulamalu Affordable Housing will be exempt from park dedication requirements, “a the County of Maui is the owner of the subject parcel.”

[17] Maui City Code 18.16.320I.1: *Subdivisions by agencies of the federal, state, and County governments shall be exempt from this section.*
Maui City Code 18.16.320I.5: *Subdivisions in which one hundred per cent of the lots or units resulting from the subdivision qualify as residential workforce housing units, as defined in section 2.96.020 of this code, shall be exempt from this section.*

Community Facilities and Services	Code	Source or Documentation
Open Space and Recreation **—Recreation**	**1**	See *Environmental Assessment Checklist, Community Facilities and Services, Open Space and Recreation, Open Resources.*
Open Space and Recreation **— Cultural Facilities**	**1**	According to the Cultural Impact Assessment conducted in May 2003 for the University of Hawaiʻi Institute for Advanced Technology Astronomy Environmental Assessment, no cultural facilities exist on the project site as it consists of open, undeveloped area that was recently mass graded. During the process of mass grading no archaeological or historical remains were found on the proposed-project site. If any remains existed, they were removed during the days of pineapple farming in the area.
Transportation	**3**	The proposed project may result in temporary construction-related traffic impacts during the construction phase. To mitigate these impacts, on-site parking will be available for construction personnel. The potential long-term effects of the proposed project on the adjacent roadways will be mitigated by encouraging pedestrian usage of sidewalks and crosswalks, and encouraging use of the existing bus system. Parking stalls on-site are limited to 128 which will in turn limit the number of vehicles on project areas roadways.

Natural Features	Code	Source or Documentation
Water Resources ***See Appendix A, Exhibit Q***	**1**	BMPs will be implemented during the construction phase as applicable in order to minimize the usage of water and to prevent water pollution from occurring. A letter of consultation was sent on August 13, 2013 to the CoM Department of Water Supply (DWS). A response was received on September 20, 2013 stating that during the building permit process, the applicant will be required to submit domestic and irrigation calculations, approved, and stamped by a licensed architect or engineer, to determine the adequacy of the water meters for the project. A letter of response was sent to CoM, DWS on October 7, 2013, stating that all feasible mitigative measures will be pursued during the construction of the proposed project. In addition, all requirements for the domestic and irrigation calculations will be submitted, approved and stamped by a licensed architect during the building permit process.
Surface Water	**1**	There are no surface water features at the project site. There are, however, two non-perennial, Inland Class 2 streams in the project's vicinity. Less than one mile to the project's south is the Kalailinui Gulch, and father away at less than 10 miles to the project's north is the Kiupulani Gulch. No adverse impacts to Kalainui Gulch or Kiupulani Gulch are anticipated as a result of the proposed project. Appropriate construction BMPs will be implemented to prevent runoff generated on the project site from impacting either stream. Upon project completion, the incremental increase in storm water runoff will be stored, infiltrated, evaporated and detained by the extensive on-site landscaping of the proposed project.
Unique Natural Features and Agricultural Lands	**1**	The project site does not contain any known unique landforms considered to be local landmarks nor places containing important information concerning natural history. The project site does not contain agricultural lands because it is zoned as "Urban" by the State and "Country Town Business" by the CoM.
Vegetation and Wildlife	**3**	See *Statutory Checklist—HUD Environmental Standards Determination and Compliance Documentation**,** Endangered Species Act [50 CFR 402]*.

Other Factors	Code	Source or Documentation
Flood Disaster Protection Act [Flood Insurance] [§58.6(a)]	**1**	The proposed action is located within the FEMA Flood Zone Designation X (shaded), which denotes that the area experiences moderate to low risk of flooding. Flood insurance is not mandatory for the proposed action because the area it is located in is not subject to flood hazards.
Coastal Barrier Resources Act/ Coastal Barrier Improvement Act [§58.6(c)]	**1**	The proposed project is located inland and is more than 15 miles away from the nearest coastline. It therefore does not contain coastal barriers, i.e. bay barriers, tombolos, barrier spits, barrier islands, dune or beach barriers, fringing mangroves.
Airport Runway Clear Zone or Clear Zone Disclosure [§58.6(d)] ***See Appendix A, Exhibit J***	**1**	The project is not located within 2,500 feet of the end of a civil airport runway or 8,000 feet of the end of a military airfield runway. The closest civil transport airport, Kahului Airport is located 10 miles west of the project site.
Other Factors	N/A	N/A

Summary of Findings and Conclusions

ALTERNATIVES TO THE PROPOSED ACTION

Alternatives and Project Modifications Considered [24 CFR 58.40(e)—"Examine alternatives to the project itself, if appropriate, including the alternative of no action."—, Ref. 40 CFR 1508.9] (Identify other reasonable courses of action that were considered and not selected, such as other sites, design modifications, or other uses of the subject site. Describe the benefits and adverse impacts to the human environment of each alternative and the reasons for rejecting it.)

A Delayed Action Alternative was considered among the options available to the proposed action. This alternative proposes to postpone construction of the multi-family housing project to a later time. Construction expenditures for the proposed project would be averted in the short-term but would eventually be required at a future date when the project is undertaken. The cost of constructing the project at a later time is expected to be higher due to changes in inflation and price escalation of labor and materials.

The potential for environmental impacts associated with delaying the proposed action are expected to be similar to the preferred alternative and would not involve significant adverse impacts.

The Delayed Alternative unlike the Proposed Alternative would fail to address the immediacy of housing needs among Maui Upcountry's residents. Housing in all areas of Maui Island has been unaffordable over a multitude of years to at least one half its year-round population and it is only expected to worsen with projected population increases and the passage of time. The persistent lack of affordable housing continues to exacerbate the difficulty many households experience in dedicating savings sufficient to meet the cost of basic necessities such as food and medical supplies, and transportation. For these reasons, the Delayed Action Alternative is considered impractical in addressing the housing situation on Maui and is therefore disregarded from further consideration.

No Action Alternative [24 CFR 58.40(e)]
(Discuss the benefits and adverse impacts to the human environment of not implementing the preferred alternative).

The No Action Alternative proposes to maintain the vacancy of the project site, leaving it unchanged. Without the construction of new buildings and the demand placed on municipal services, the No Action Alternative will avoid the potential for environmental impacts. The No Action Alternative however does not address the purpose of the project which is to address the need and demand for affordable housing on Maui. Because the No Action Alternative would fail to address this requirement, it is removed from further consideration.

Mitigation Measures Recommended [24 CFR 58.40(d), 40 CFR 1508.20] (Recommend feasible ways in which the proposal or its external factors should be modified in order to minimize adverse environmental impacts and restore or enhance environmental quality.)

1. Based on review by the SHPD, a qualified archaeologist will be on-site for all ground altering activities during the early phases of the project, and for all excavations that are planned to proceed below 1 meter in depth. However, if the excavation proves to be entirely contained within sterile fill, then monitoring activities may be switched to an on-call basis following direct consultation with SHPD.

2. To address construction noise, all internal combustion equipment will be muffled in accordance with standard engine operating practices. No further mitigation measures beyond the use of properly muffled engine equipment and limiting the hours of work are anticipated to be required. If equipment used during construction generates noise higher than allowed by the Noise Code, a Noise Permit from the Department Health will be obtained. No work during nights and weekends are anticipated, and a Noise Variance will not be required.

3. During construction, fugitive dust could be generated that would be a nuisance source of air pollution. Where applicable, fugitive dust will be controlled with dust fencing and regular wetting of disturbed areas by the contractor. No further mitigation measures with regards to air quality are anticipated to be required. Exposed earth will be planted at the earliest opportunity to reduce soil erosion and minimize dust impacts.

4. To address drainage issues, the project will comply with applicable storm water runoff provisions in accord with State Department of Health and County of Maui drainage standards.

Additional Studies Performed
(Attach studies or summaries)

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Appendix A—Exhibits

Figure 1—Proposed Kulamalu Affordable Housing

Figure 2—Proposed Kulamalu Affordable Housing Multi-Purpose/Community Center Building

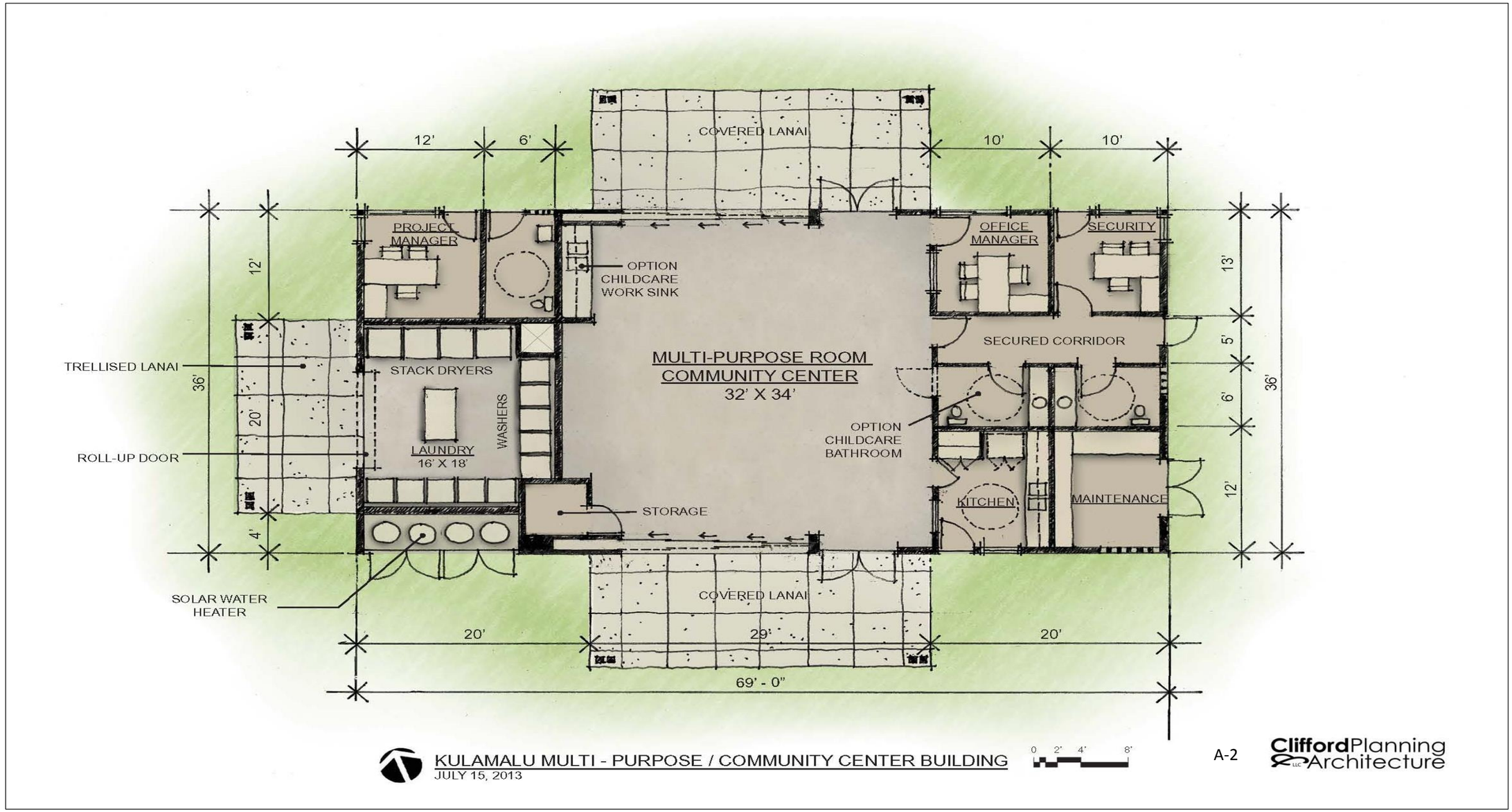

Exhibit A—Historic Preservation [36 CFR 800]

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Planning
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Project and Construction Management

August 13, 2013

Nicki Ann Thompson
Interim Administrator
State Historic Preservation Division
Department of Land and Natural Resources
State of Hawai'i
601 Kamokila Boulevard, Room 555
Kapolei, Hawai'i 96707

Dear Ms. Thompson:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments prior to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

It is our preliminary determination that this project will have no adverse impacts on archaeological or historic or cultural resources. The project site consists of open, undeveloped area that was subject to previous extensive mass grading for the Kulamalu Project (TMK (2) 2-3-008: por. 038, 039) in 1997. Prior to the mass grading activities, an Archaeological Reconnaissance Survey (1996, March) was undertaken for TMK (2) 2-3-008: por. 5, which encompasses the current project site. Findings from the Archaeological Reconnaissance Survey included two previously recorded sites, (SHIP No.s 50-50-10-1061 and 50-50-10-1062), two newly sites recorded (SHIP No.s 50-50-10-4179 and 50-50-10-4178), and two unrecorded collections of rocks in the adjoining property. One new site was identified during the Survey but after test unit excavations, the site was deemed no longer significant as the only artifacts found were assigned a function of historic to modern agriculture.

Ms. Nicki Ann Thompson
August 13, 2013
Page 2

The Kulamalu Project also includes the Archaeological Reconnaissance Survey for the Pukalani Project Area (1996, February)[1]. Similarly to the Kulamalu Project's Archaeological Reconnaissance Survey, the surveyed area encompasses the current Kulamalu Affordable Housing project area. Only one petroglyph site was found and it was located near the project boundary and subsequently handled according to the State of Hawai'i Historic Preservation Division's recommendations.

During the process of mass grading for the Kulamalu Project in 1997 no archaeological or historical remains were found. If any remains existed, they were removed during the days of pineapple farming in the area. Additional remains are not anticipated to be found.

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

[1] 1997, July 25. Final Environmental Assessment Kulamalu Project. Retrieved from: http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Maui/1990s/1997-08-08-MA-FEA-KULAMALU.pdf

Ms. Nicki Ann Thompson
August 13, 2013
Page 3

cc: Jenna Pickett, Maui-Assistant Archaeologist
Maui Office, State Historic Preservation Division
Department of Land and Natural Resources, State of Hawai‘i

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ESTHER KIA'AINA
FIRST DEPUTY

WILLIAM M. TAM
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

HISTORIC PRESERVATION DIVISION
DEPARTMENT OF LAND AND NATURAL RESOURCES

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

September 19, 2013

Mr. Chester Koga
R.M. Towill Corporation
2024 North King Street, Suite 200
Honolulu HI 96819

LOG NO: 2013.4842
DOC NO: 1309JP11
Archaeology

Aloha Mr. Koga:

SUBJECT: Chapters 6E-42 and 343 Historic Preservation Review-
Consultation for the Kulamalu Affordable Housing Draft Environmental Assessment
A'apueo Ahupua'a, Makawao District, Maui Island
TMK: (2) 2-3-066:012, 013, and 014 (Formerly portion of 2-3-008:044)

Thank you for the opportunity to provide consultation regarding the submittal letter for the proposed Kulamalu affordable housing project, which was received by our office on August 14, 2013. The Department of Housing and Human Concerns, County of Maui proposed to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone, and two concrete driveways.

The 4.179 acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. We previously provided comments for the Kulamalu development (*Doc 9712BD35-36; Log 1998.20843, Doc 9801CD18; Log 1999.24075, Doc 9909RC06; Log 1999.23869, Doc 9905CD03; Log 1999.23869, Doc 9907CD31; Log 2000.25597, Doc 0006CD07; Log 2000.28125, Doc 0008CD31; Log 2001.26839, Doc 0101MK08; Log 2001.30948, Doc 0102CD01; Doc 0210MK16; Doc 0210CD23; Log 2003.26931, Doc 0301CD07; Log 2003.2175, Doc 0310MK20; Log 2003.2176, Doc 0310MK21; Log 2003.0053, Doc 0303CD42; Log 2003.0363, Doc 0304CD28; Log 2003.0364, Doc 0304CD29; Log 2003.0953, Doc 0306MK30; Log 2003.1151, Doc 0307CD12; Log 2003.2123, Doc 0310MK16; Log 2003.2124, Doc 0310MK17; Log 2003.2175, Doc 0310MK20; Log 2005.0403, Doc 0503MK02; Log 2005.2405, Doc 0511MK31; and Log 2006.2667, Doc 0608MK02)*.

Contrary to the information submitted in your request for consultation, there have been several historic properties documented within the Kulamalu development and listed on the State Inventory of Historic Places (SIHP), including the Kalialinui Petroglyphs in the southwest portion of Kulamalu (SIHP 50-50-10-1061) and the Kaluapulani Petroglyphs (SIHP 50-50-10-1062). Two additional petroglyph panels were documented in a branch (possibly Ha'akakai Gulch) of the same gulch (SIHP 50-50-10-4179). An agricultural site (SIHP 50-50-10-4181) and a boundary wall were also recorded (SIHP 50-50-10-4180).

Mass excavation activities for the originally proposed retention basin at Kulamalu uncovered a significant historic archaeological site (SIHP 50-50-10-5173). The site was identified beneath the pineapple till zone and is comprised of a Historic Cemetery with at least 15 individuals (8 burials in wooden coffins and 7 in pit features), water worn grave markers, 5 associated burning episodes, 4 unexcavated pit features, and 1 disturbed animal burial. A rock mound was also documented with associated fire vestige that yielded a date of A.D. 1450-1660 (SIHP 50-50-10-5469) and a drainage or irrigation ditch (SIHP 50-50-10-5470).

There are significant historic archaeological sites in the vicinity, including at least 32 petroglyphs located on a panel across the Kula Highway northeast (upslope) of the subject area (SIHP 50-50-10-2920). The Pukalani Petroglyphs (SIHP 50-50-10-1231) and the Hamakua Burial Cave (SIHP 50-50-10-1264) are both located at a lower elevation in the same gulch.

Mr. Koga
September 19, 2013
Page 2

The Cemetery (50-50-10-5173) and petroglyph sites (50-50-10-1061, 1062, and 4179) are designated for permanent preservation. We consistently recommended archaeological monitoring for ground altering activities at Kulamalu. We have accepted an archaeological monitoring plan (Archaeological Services Hawaii, LLC.) indicating that archaeological monitoring shall be conducted in all areas where original soils will be encountered.

Some areas have been previously monitored and consist of "fill" and much of the area previously consisted of rock/cinder that was blasted. In contrast, some of the areas still consist of original undisturbed soil. At this time, our records do not adequately reflect information to determine the status of the exact location of previously disturbed and original contexts. We also do not have any construction plans for the proposed affordable housing project so we are unable to provide mitigation recommendations at this time.

Subsequently, we recommend that additional information be submitted with respect to the proposed project, in order to identify, document, or provide mitigation recommendations for documented or potentially undocumented cultural features that may be encountered during the project. Please contact Jenny Pickett at (808) 243-1285 or Jenny.L.Pickett@Hawaii.gov for any questions or concerns about this letter.

Mahalo,

Theresa Donham
Archaeology Branch Chief

cc: County of Maui, Department of Planning via email: planning@mauicounty.gov
County of Maui DSA via fax to: (808) 270-7972
Ingrid Friedberg (ingridf@rmtowill.com)

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

R. M. TOWILL CORPORATION
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Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Project and Construction Management

October 21, 2013

Ms. Jenny Pickett, Maui-Assistant Archaeologist
Maui Office, State Historic Preservation Division
Department of Land and Natural Resources
601 Kamokila Boulevard, Room 555
Kapolei, Hawai'i 96707

Dear Ms. Pickett:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i
Reference: LOG NO: 2013.4842; DOC NO: 1309JP11

Thank you for your letter dated September 19, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *Contrary to the information submitted in your request for consultation, there have been several historic properties documented within the Kulamalu development and listed on the State Inventory of Historic Places (SIHP), including the Kalialinui Petroglyphs in the southwest portion of Kulamalu (SIHP 50-50-10-1061) and the Kaluapulani Petroglyphs (SIHP 50-50-10-1062). Two additional petroglyph panels were documented in a branch (possibly Ha'akakai Gulch) of the same gulch (SIHP 50-50-10-4179). An agricultural site (SIHP 50-50-10-4181) and a boundary wall were also recorded (SIHP 50-50-10-4180).*

We have noted that historic properties have been identified on neighboring sites within the Kulamalu Commercial Subdivision. The County of Maui will engage an archaeologist consultant prior to the permitting stage in order to prepare a monitoring plan.

> *Mass excavation activities for the originally proposed retention basin at Kulamalu uncovered a significant historic archaeological site (SIHP 50-50-10-5173). The site was identified beneath the pineapple till zone and is comprised of a Historic Cemetery with at least 15 individuals (8 burials in wooden coffins and 7 in pit features), water worn grave markers, 5 associated burning episodes, 4 unexcavated pit features, and 1 disturbed animal burial. A rock mound was also documented with associated fire vestige that yielded a date of A.D. 1450-1660 (SIHP 50-50-10-5469) and a drainage or irrigation ditch (SIHP 50-50-10-5470).*

The Kulamalu Affordable Housing property has been subject to previous site disturbance and largely consists of cut areas or fill material. Excavation of native grades for the Kulamalu Affordable Housing will be limited to the uppermost slope of the project site which comprises of a small portion of the entire site. Once grading activities commence for the proposed project, if remains are found, construction will halt immediately and the State Historic Preservation Division (SHPD) will be contacted for further guidance.

Ms. Jenny Pickett, Maui-Assistant Archaeologist
Maui Office, State Historic Preservation Division
Page 2

> *There are significant historic archaeological sites in the vicinity, including at least 32 petroglyphs located on a panel across the Kula Highway northeast (upslope) of the subject area (SIHP 50-50-10-2920). The Pukalani Petroglyphs (SIHP 50-50-10-1231) and the Hamakua Burial Cave (SIHP 50-50-10-1264) are both located at a lower elevation in the same gulch.*

In the event that remains are found during the limited grading activities, construction will be halted, and the State Historic Preservation Division (SHPD) will be contacted for further guidance. An archaeological monitor will also be present to monitor all ground altering activities.

> *The Cemetery (50-50-10-5173) and petroglyph sites (50-50-10-1061, 1062, and 4179) are designated for permanent preservation. We consistently recommended archaeological monitoring for ground altering activities at Kulamalu. We have accepted an archaeological monitoring plan (Archaeological Services Hawaii, LLC.) indicating that archaeological monitoring shall be conducted in all areas where original soils will be encountered.*

The archaeological monitoring plan will be prepared prior to the permitting stage will be adhered to during construction. In the event that historic properties are encountered during any ground altering activities on the proposed project site, construction activities will be halted immediately and SHPD will be contacted for further guidance.

> *Some areas have been previously monitored and consist of "fill" and much of the area previously consisted of rock/cinder that was blasted. In contrast, some of the areas still consist of original undisturbed soil. At this time, our records do not adequately reflect information to determine the status of the exact location of previously disturbed and original contexts. We also do not have any construction plans for the proposed affordable housing project so we are unable to provide mitigation recommendations at this time.*

Because your records do not adequately reflect information to determine the status of the previously disturbed and original context, an archaeological monitor will be present for all ground monitoring activities.

> *Subsequently, we recommend that additional information be submitted with respect to the proposed project, in order to identify, document, or provide mitigation recommendations for documented or potentially undocumented cultural features that may be encountered during the project. Please contact Jenny Pickett at (808) 243-1285 or Jenny.L.Pickett@Hawaii.gov for any questions or concerns about this letter.*

It may be possible to accommodate your request for additional information depending on the type of information that is requested. Please specify the type of information you would like and we will make every reasonable accommodation to address your request.

We appreciate this opportunity to respond. Should you wish to provide further input to the proposed project, please contact the undersigned.

Ms. Jenny Pickett, Maui-Assistant Archaeologist
Maui Office, State Historic Preservation Division
Page 3

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Nicki Ann Thompson, Interim Administrator
Department of Land and Natural Resources, State of Hawai'i

Theresa Donham, Archaeology Branch Chief
Department of Land and Natural Resources, State of Hawai'i

NEIL ABERCROMBIE
GOVERNOR
STATE OF HAWAII

JOBIE M. K. MASAGATANI
CHAIRMAN
HAWAIIAN HOMES COMMISSION

DARRELL T. YOUNG
DEPUTY TO THE CHAIRMAN

STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS
P. O. BOX 1879
HONOLULU, HAWAII 96805

November 21, 2013

R.M. Towill Corporation
Attn: Mr. Chester Koga
2024 North King Street, Suite 200
Honolulu, Hawai'i 96819

Dear Mr. Koga:

Subject: National Historic Preservation Act, Section 106 Consultation for the Proposed Kulamalu Affordable Housing
TMK (2) 2-3-066: 012, 013, and 014 Makawao District, Maui Hawai'i

Thank you for the opportunity to review the proposed project. The Department of Hawaiian Home Lands has no comment to offer at this time.

If you have any questions, please contact our Planning Office at 620-9480

Aloha,

Darrell C. Yagodich,
Planning Program Manager

cc: A. Murata, County of Maui

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

R. M. TOWILL CORPORATION
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Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Project and Construction Management

January 22, 2014

Mr. Darrell C. Yagodich, Planning Program Manager
Department of Hawaiian Homes Lands
State of Hawai'i
P.O. 1879
Honolulu, Hawai'i 96805

Dear Mr.Yagodich:

National Historic Preservation Act, Section 106 Consultation for the Proposed Kulamalu Affordable Housing
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated November 21, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *Thank you for the opportunity to review the proposed project. The Department of Hawaiian Home Lands has no comment to offer at this time.*

We acknowledge that the State of Hawai'i Department of Hawaiian Home Lands does not have any comments to offer at this time.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

List of Native Hawaiian Parties, Organizations and Individuals Consulted with Pursuant to Section 106 of the National Historic Preservation Act

***** An asterisk is used to denote that an entity was unable to be reached because letters were returned marked undeliverable.

Aha o Moku Maui Inc.
Aha Moku o Kahikinui *****
Association of Hawaiian Civic Clubs
Association of Hawaiian for Homestead Lands *****
Au Puni o Hawaiʻi
Mr. Brian Kaniela Naeʻole Naauao
Central Maui Hawaiian Civic Club
Council for Native Hawaiian Advancement
Department of Hawaiian Homelands
Friends of ʻIolani Palace
Friends of Mokuʻula
Mr. George K. Cypher ʻOhana
Hawaiʻi Maoli
Hawaiian Civic Club of Hilo
Hui Hoʻoniho
Hui Kākoʻo ʻĀina Hoʻopulapula *****
Kākoʻo ʻŌiwi
Kanu o ka ʻĀina Learning ʻOhana
Koʻolau Foundation
Moku o Kaupo
Na Aikane o Maui *****
Na Kuʻauhau ʻo Kahiwakaneikopolei
Native Hawaiian Organizations Association
Nekaifes Ohana *****
Office of Hawaiian Affairs
Papa o Lokahi
Paukukalo Hawaiian Homes Community Association
Royal Hawaiian Academy of Traditional Arts
Waiehu Kou Phase 3 Association

Template of Section 106 Consultation Letters Sent Out to the List of Native Hawaiian Parties, Organizations and Individuals:

R. M. TOWILL CORPORATION

November 15, 2013

Michelle Ka'uhane, President
Council for Native Hawaiian Advancement
2149 Lauwiliwili Street
Kapolei, Hawai'i 96707

Dear Ms. Ka'uhane:

National Historic Preservation Act, Section 106 Consultation for the
Proposed Kulamalu Affordable Housing
TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments pursuant to Section 106 of the National Historic Preservation Act (NPHA) of 1966 (36 CFR Part 800) in advance of developing the subject project. The County of Maui Department of Housing and Human Concerns, proposes to construct Kulamalu Affordable Housing, a project consisting of 64 affordably priced rental housing units, a community center and 133 parking stalls on land owned by the County of Maui. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See Attachment 1, Project Location and Attachment 2, Conceptual Site Plan. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014. The use of federal funds from the U.S. Department of Housing and Urban Development (HUD) via the County of Maui HOME Investment Partnerships Program requires compliance with Section 106 NPHA.

It is our preliminary determination that this project will have no adverse impacts on archaeological, historic or cultural resources. The project site was subject to previous extensive mass grading for the Kulamalu Project (TMK (2) 2-3-008: por. 038, 039) in 1997 and consists of cut areas or fill material and is currently open and unimproved. The project site is accessible by the existing roadway network that includes Kula Highway and includes services connections to utilities. Excavation of native grades for the Kulamalu Affordable Housing will be limited to the uppermost slope of the project site which comprises a small portion of the entire site. The entire project site will be landscaped.

The project site was studied to determine if cultural or historic properties were located on the project site and vicinity. If cultural remains are found once grading activities commence for the proposed project, construction will halt immediately and the SHPD will be contacted for further

Ms. Michelle Ka'uhane
November 15, 2013
Page 2

guidance. An archaeological monitor will also be present to monitor ground altering activities where undisturbed soil exist. The archaeological monitoring plan will be prepared prior to the permitting stage will be adhered to by the contractor during construction.

Thank you for this opportunity to inform you of this important project. Further, be advised that an environmental assessment is being prepared for public review. Should you wish to provide input to the proposed project please send your comments by January 6th, 2014 to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: A. Murata, County of Maui

Exhibit B—Floodplain Management [24 CFR, Executive Order 119988]

Exhibit B—FEMA Flood Zone Designations and Wetland Areas, FIRM Map No. 150003INDOB

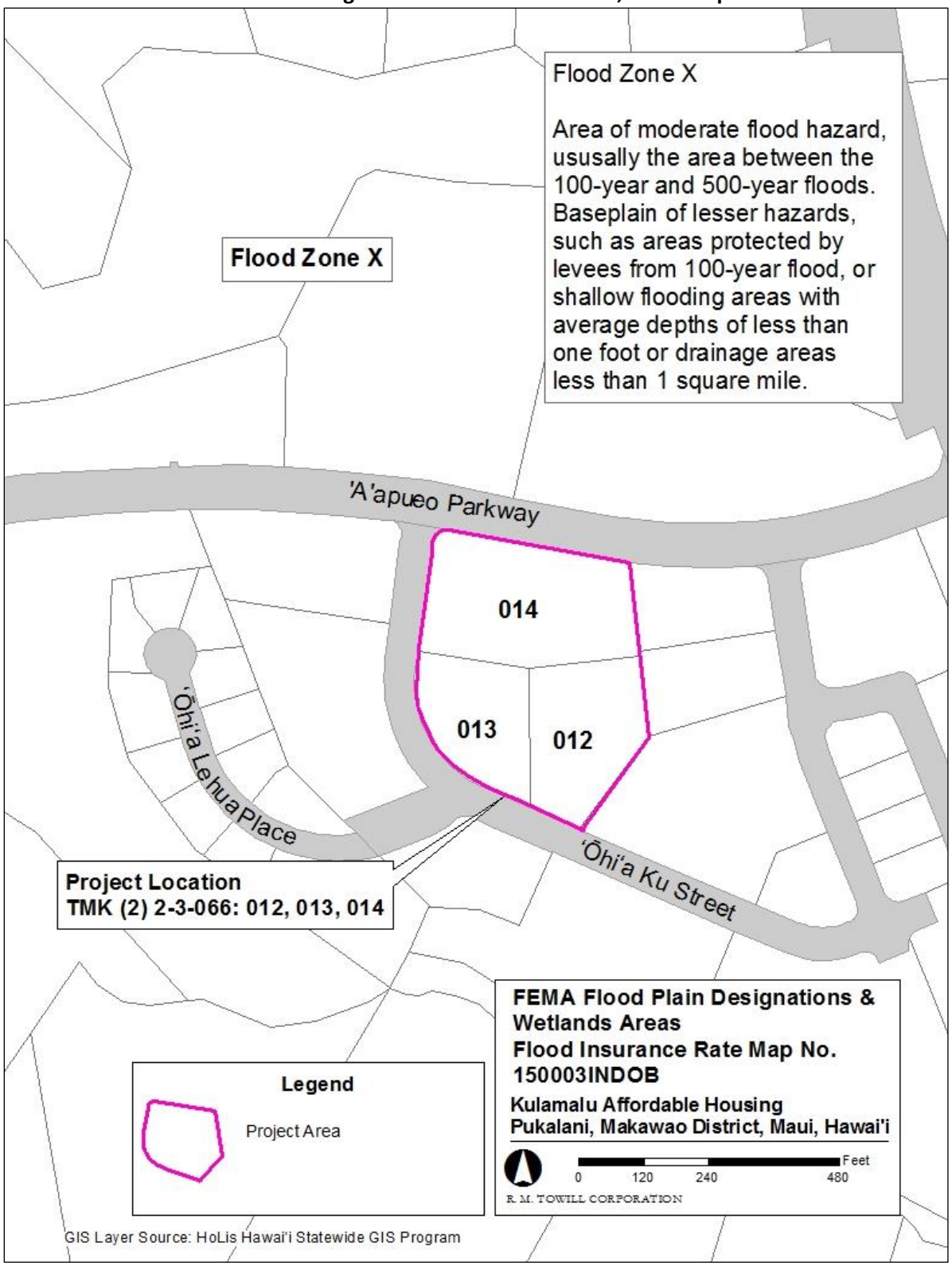

Exhibit C—Wetlands Protection [Executive Order 11990]

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

R. M. TOWILL CORPORATION
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Planning
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Project and Construction Management

August 13, 2013

George P. Young
Chief
Honolulu Engineer District
United States Army Corps of Engineers
Building 230, Room 302
Fort Shafter, Hawai'i 96585

Dear Chief Young:

Floodplain Management (24 CFR 55, Executive Order 11988), Wetlands Protection (Executive Order 11988), and Flood Disaster Protection Act (24 CFR 58.6) Consultation for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment
TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments prior to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

Use of funds from Housing and Urban Development (HUD) requires a Floodplain Management (24 CFR 55, Executive Order 11988), Wetlands Protection (executive Order 11988), and Flood Disaster Protection Act (24 CFR 58.6) consultation to ascertain if the proposed project is located within a flood hazard area or designated wetland. It is our preliminary determination that this project is not located within a flood hazard or wetland area based on FIRM Map No. 150030260. This project is located within an area designated as Zone X (shaded), which denotes it is outside the 100-year floodplain.

Chief George P. Young
August 13, 2013
Page 2

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

DEPARTMENT OF THE ARMY
HONOLULU DISTRICT, U.S. ARMY CORPS OF ENGINEERS
FORT SHAFTER, HAWAII 96858-5440

September 10, 2013

Regulatory Branch

File Number **POH-2013-00160**

R.M. Towill Corporation
Attention: Chester Koga
2024 North King Street, Suite 200
Honolulu, Hawaii 96819-3494

NO PERMIT REQUIRED

Dear Mr. Koga:

This responds to your August 13, 2013 letter requesting the Department of the Army (DA) comments for a draft Environmental Assessment (EA) prepared for the proposed Kulamalu Affordable Housing project at TMKs (2) 2-3-066: 012, 013, and 014, Pukalani, Makawao District, Maui Isle, Hawaii. Reference number **POH-2013-00160** is assigned this project. Please cite this reference number in any future correspondence concerning this project.

We have completed review of the information submitted pursuant to our authorities under Section 10 of the Rivers and Harbors Act of 1899 (Section 10) and Section 404 of the Clean Water Act (Section 404). For your information, Section 10 requires that a DA permit be obtained from the U.S. Army Corps of Engineers (Corps) prior to undertaking any construction, dredging, or other activity occurring in, over, or under or affecting navigable waters of the U.S. For tidal waters, the shoreward limit of the Corps' jurisdiction extends to the Mean High Water Mark. Section 404 requires that a DA permit be obtained for the discharge (placement) of dredged and/or fill material into waters of the U.S., including wetlands. For tidally influenced waters, in the absence of adjacent wetlands, the shoreward limit of the Corps' jurisdiction extends to the High Tide Line, which in Hawai'i may be approximated by reference to the Mean Higher High Water Mark. For non-tidal waters, the lateral limits of the Corps' jurisdiction extend to the Ordinary High Water Mark or the approved delineated boundary of any adjacent wetlands.

Based on the information you submitted, it appears the project site consist entirely of uplands and absent of waters of the U.S. We anticipate the proposed 4.179-acre housing development project and appurtenant structures will not involve the discharge of fill material into waters of the U.S.; **therefore, a DA permit is not required**. This determination does not relieve you of the responsibility to obtain any other permits, licenses, or approvals that may be required under County, State, or Federal law for your proposed work.

Thank you for contacting us regarding this project and providing us with the opportunity to comment. Should you have any questions, please contact Ms. Joy Anamizu at 808-835-4308 or via e-mail at *Joy.N.Anamizu@usace.army.mil*.

Sincerely,

George P. Young, P.E.
Chief, Regulatory Branch

2024 North King Street
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Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

R. M. TOWILL CORPORATION
SINCE 1930

Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Project and Construction Management

October 21, 2013

Mr. George P. Young, Chief
Honolulu Engineer District
United States Army Corps of Engineers
Building 230, Room 302
Fort Shafter, Hawai'i 96585

Dear Chief Young:

Floodplain Management (24 CFR 55, Executive Order 11988), Wetlands Protection (Executive Order 11988), and Flood Disaster Protection Act (24 CFR 58.6) Consultation for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i
Reference File Number POH-2013-00160

Thank you for your letter dated September 10, 2013, relating to the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *Based on the information you submitted, it appears the project site consist entirely of uplands and absent of waters of the U.S. We anticipate the proposed 4.179-acre housing development project and appurtenant structures will not involve the discharge of fill material into waters of the U.S.; therefore, a DA permit is not required.*

We acknowledge your assessment that a Department of the Army (DA) permit is not required for Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act. Comments received by DA branches will be included in the project's Draft Environmental Assessment in accordance with Hawai'i Revised Statues, Chapter 343; the National Environmental Policy Act; and, U. S. Department of Housing and Urban Development.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Exhibit D—Coastal Zone Management Act [Sections 307(c), (d)]

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SINCE 1930

Planning
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Project and Construction Management

August 13, 2013

Jesse K. Souki
Director
Office of Planning
State of Hawai'i
P.O. Box 2359
Honolulu, Hawai'i 96804-2359

Dear Mr. Souki:

Consultation and Request for Consistency Determination of Coastal Zone Management Act (Sections (c), (d)), and Coastal Resources Act/Coastal Barrier Improvement Act (Section 58.6(c)) for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments prior to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

The project is consistent with existing land use and zoning designations for the property. The State of Hawai'i Land Use District is Urban, where affordable housing is a permitted use. The County of Maui zoning for the project site is County-Business Town, which allows for a mixture of retail, offices, residential, entertainment enterprises and related accessory uses.

This purpose of this letter is also to request a Coastal Zone Management Act (CZMA) Consistency Determination. Use of funds from Housing and Urban Development (HUD) requires Coastal Management Zone Act (Sections 307 (c),(d)), and Coastal Barrier Resources Act/Coastal Barrier Improvement Act (CBRA/CBIA) (Section 58.6(c)) Consultation to ascertain if the proposed project is consistent with the requirements of both laws.

Mr. Jesse K. Souki
August 13, 2013
Page 2

It is our preliminary determination that this project is consistent with the requirements of the Coastal Zone Management Act (Sections 307(c), (d)) and the Coastal Barrier Resources Act/Costal Barrier Improvement Act (Section 58.6(c)), and will have no adverse impacts on coastal resources as it is located over 10 miles from the nearest shoreline. Please submit any written comments to us within 30 days from the date of receipt of this letter.

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

Leo Asuncion, Planning Program Manager
Coastal Zone Management Program, Office of Planning, State of Hawai'i

OFFICE OF PLANNING
STATE OF HAWAII

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

NEIL ABERCROMBIE
GOVERNOR

JESSE K. SOUKI
DIRECTOR
OFFICE OF PLANNING

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: http://hawaii.gov/dbedt/op/

Ref. No. P-14082

August 19, 2013

Mr. Chester Koga
R. M. Towill Corporation
2024 N. King Street, Suite 200
Honolulu, Hawaii 96819

Dear Mr. Koga:

Subject: Hawaii Coastal Zone Management (CZM) Program Federal Consistency Review for U.S. Department of Housing and Urban Development (HUD) Funding for the Proposed Kulamalu Affordable Housing, Makawao, Maui

This responds to your request for CZM federal consistency review for HUD funding for the proposed Kulamalu Affordable Housing Project in Makawao, Maui. The proposed use of funding from HUD does not require Hawaii CZM Program federal consistency review. The Hawaii CZM Program does not review any HUD assistance programs, grants, or loans for federal consistency in accordance with Section 307(d) of the Coastal Zone Management Act and 15 CFR Part 930. There are no HUD assistance programs identified on the Hawaii CZM Program listing of federal assistance programs subject to consistency review, pursuant to 15 CFR §930.95.

The Office of Planning, as the lead agency for the Hawaii CZM Program, does not review actions relevant to the Coastal Resources Act/Coastal Barrier Improvement Act. Therefore, we do not provide consultation reviews relevant to this act.

This CZM federal consistency statement does not represent an endorsement of the project nor does it convey approval with any regulations administered by any state or county agency. If you have any questions, please call John Nakagawa of our CZM program at 587-2878.

Sincerely,

Jesse K. Souki
Director

c: Ms. Jo-Ann Ridao,
Department of Housing and Human Concerns, County of Maui
Department of Planning, County of Maui

2024 North King Street
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Planning
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October 21, 2013

Mr. Jesse K. Souki, Director
Office of Planning
State of Hawai'i
P.O. Box 2359
Honolulu, Hawai'i 96804-2359

Dear Mr. Souki:

Consultation and Request for Consistency Determination of Coastal Zone Management Act (Sections (c), (d)), and Coastal Resources Act/Coastal Barrier Improvement Act (Section 58.6(c)) for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 19, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *The proposed use of funding from HUD does not require Hawai'i CZM Program federal consistency review. The Hawai'i CZM Program does not review any HUD assistance programs, grants, or loans for federal consistency in accordance with Section 307(d) of the Coastal Zone Management Act and 15 CFR Part 930. There are no HUD assistance programs identified on the Hawai'i CZM Program listing of federal assistance programs subject to consistency review, pursuant to 15 CFR §930.95.*

We acknowledge that the Hawai'i CZM Program does not review any HUD assistance programs, grants or loans for federal consistency because there are no HUD assistance programs identified on the Hawai'i CZM Program listing of federal assistance programs subject to consistency review.

We appreciate your review of the subject document. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

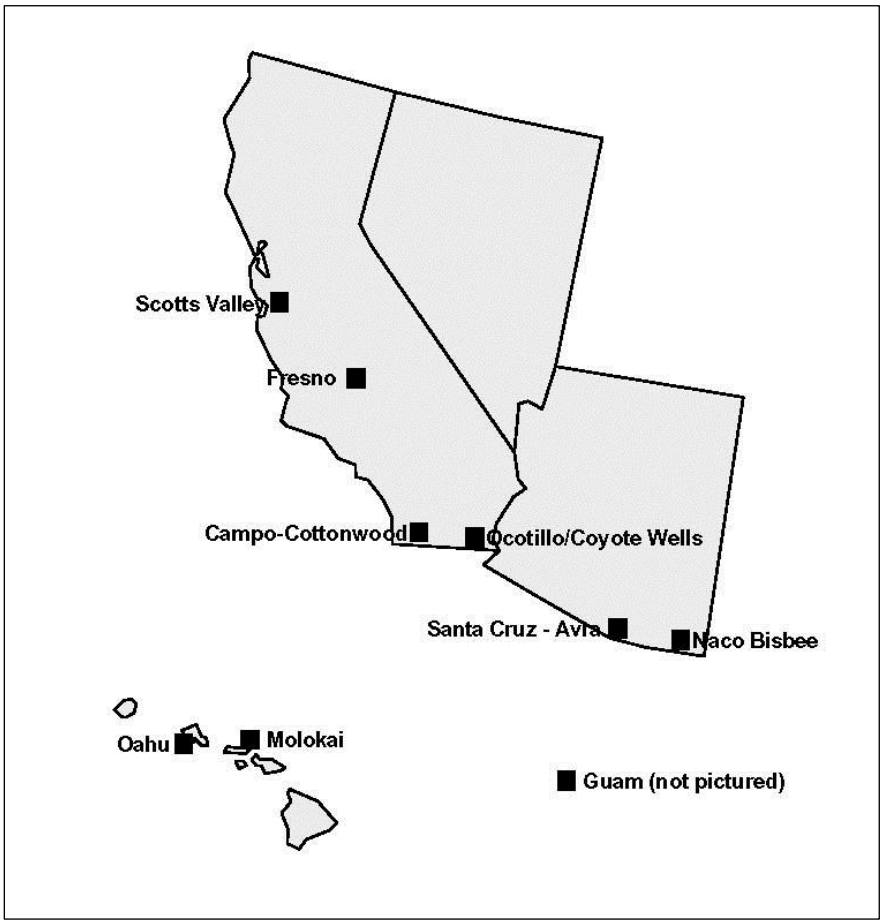
Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui
Leo Asuncion, Planning Program Manager
Coastal Zone Management Program, Office of Planning, State of Hawai'i

Exhibit E—Sole Source Aquifers [40 CFR 149]

Exhibit E—Sole Source Aquifers Map, EPA Region 9



Source: 2000, June. Environmental Protection Agency, Region 9 Ground Water Office (WTRR-9). Sole Source Aquifer Designations in EPA

Exhibit F—Endangered Species Act [50 CFR 402]

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August 13, 2013

Loyal Mehroff
Field Supervisor
Pacific Islands Fish and Wildlife Office
United States Department of the Interior
300 Ala Moana Boulevard, Box 50088
Honolulu, Hawai'i 96850-5000

Dear Mr. Mehroff:

Section 7 Endangered Species Act (50 CFR 402) Consultation for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments prior to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

Use of funds from Housing and Urban Development (HUD) requires an Endangered Species Act Section 7 (50 CFR 402) consultation to solicit comments on potential effects to listed, proposed, or candidate species and critical habitats resulting from the proposed project. The project site has been previously graded for the Kulamalu Project (TMK (2) 2-3-008: por. 038, 039) in 1997 and it is devoid of trees. Ground cover is limited to non-native grasses. See **Attachment 3, Photographs of the Project Site Ground Cover.**

Mr. Loyal Mehroff
August 13, 2013
Page 2

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

United States Department of the Interior

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

In Reply Refer To:
2013-TA-0420

SEP 11 2013

Mr. Chester Koga
Project Coordinator
R.M. Towill Corporation
2024 North King Street
Honolulu, Hawaii 96819-3494

Subject: Technical Assistance for the Proposed Kulamalu Housing Complex, Maui

Dear Mr. Koga:

The U.S. Fish and Wildlife Service (Service) received your letter on July 14, 2013, requesting comment on the proposed development of a 64-unit housing complex on 4.179 acres at the Kulamalu Town Center [TMK (2) 2-3-008:038, 039], on Maui.

Project Description
The proposed project involves the construction of 64 housing units, a community center, 133 parking stalls, a loading zone, and two driveways on vacant land within the Kulamalu Town Center west of the Kula Highway on Maui. Proposed construction is anticipated to begin in the late summer or fall of 2014

Species Affected
Based on information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Program, five species protected by the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*), may occur within, or transit through, the proposed action area and could be impacted by the proposed action: the endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*), Blackburn's sphinx moth (*Manduca blackburni*), Hawaiian goose (*Branta sandvicensis*), Hawaiian petrel (*Pterodroma sandwichensis*), and the threatened Newell's shearwater (*Puffinus auricularis newelli*).

To help you minimize potential impacts to listed species, the Service is providing you the following avoidance and minimization measures. Please note that implementation of these measures does not ensure that impacts to listed species can be avoided, and further coordination with the Service on compliance with the ESA may be required.

- The Hawaiian hoary bat is known to occur throughout the island of Maui. This bat roosts in both exotic and native woody vegetation and, while foraging, leaves young unattended in "nursery" trees and shrubs. If trees or shrubs suitable for bat roosting are cleared during the hoary bat breeding season (June 1 to September 15), there is a risk that young bats could inadvertently be harmed or killed. As a result, the Service recommends that woody plants greater than 15 feet tall should not be removed or trimmed during the Hawaiian hoary bat breeding season.

- The Blackburn's sphinx moth may presently breed and feed within the proposed action area. Adult moths feed on nectar from native plants, including beach morning glory (*Ipomoea pes-caprae*), iliee (*Plumbago zeylanica*), and maiapilo (*Capparis sandwichiana*); larvae feed upon non-native tree tobacco (*Nicotiana glauca*) and native aiea (*Nothocestrum latifolium*). Blackburn's sphinx moth pupae may occupy the soil within 35 feet of larval host plants for up to a year. The Service recommends that a qualified biologist survey the project area, and areas adjacent to the project footprint, for the presence of native and non-native Blackburn's sphinx moth host plants. We also recommend that these surveys be conducted during the wettest portion of the year (usually November-April) and approximately four to eight weeks following a significant rainfall event. Surveys should include looking for eggs, larvae, and signs of larval feeding (chewed stems, frass, or leaf damage). If presence of the Blackburn's sphinx moth is confirmed, the Service should be contacted for further guidance.

- Due to its range and foraging behavior, the Hawaiian goose may be present in the vicinity of the proposed action at any time of the year. If a Hawaiian goose appears within 100 feet of ongoing construction work, all activity shall be temporarily suspended until the bird moves off to a safe distance of its own volition. Moreover, if any number of Hawaiian geese are observed loafing or foraging within the area of the proposed project during the Hawaiian goose breeding season (October through April), a biologist familiar with the nesting behavior of the Hawaiian goose should survey in and around the proposed construction footprint prior to the resumption of any work, or after any subsequent delay of work of three or more days (during which the birds may attempt to nest). If a nest is discovered within a radius of 150 feet of proposed construction work, or a previously undiscovered nest is found within said radius after work begins, all work must cease immediately and the Service contacted for further guidance.

- The Hawaiian petrel and Newell's shearwater, collectively referred to as seabirds, may transit through the proposed action area while flying between the ocean and nesting sites in the mountains during their breeding season (March through December). Seabird fatalities resulting from collisions with artificial structures that extend above the surrounding vegetation have been documented in Hawaii where high densities of transiting seabirds occur. Additionally, outdoor artificial lighting such as flood lighting for construction work, security, and outdoor illumination can adversely impact seabirds by causing disorientation which may result in collision with utility lines, buildings, fences, and vehicles. Fledging seabirds are especially affected by artificial lighting and have a tendency to exhaust themselves while circling the light sources and become grounded. Too weak to fly, these birds become vulnerable to depredation by feral

predators such as dogs, cats, and mongoose. Therefore, the Service recommends that project-related lighting should be minimized. All project-related lights should be shielded so the bulb is not visible at or above bulb-height.

The Service also recommends that a biosecurity assessment be conducted to address the potential impacts of invasive species introduction and transport due to the advent of construction-related materials and heavy vehicles into the action area during the construction phase of the proposed project. Accordingly, the Service can provide guidelines for invasive species containment and mitigation through Best Management Practices upon request.

If you have any questions concerning the recommendations or comments provided in this letter, please contact Ian Bordenave, Fish and Wildlife Biologist, at (808) 792-9400.

Sincerely,

Jess Newton

for Loyal Mehrhoff
Field Supervisor

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October 21, 2013

Mr. Loyal Mehroff, Field Supervisor
Pacific Islands Fish and Wildlife Office
United States Department of the Interior
300 Ala Moana Boulevard, Box 50088
Honolulu, Hawai'i 96850-5000

Dear Mr. Mehroff:

Section 7 Endangered Species Act (50 CFR 402) Consultation for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 11, 2013, concerning the proposed project. We offer the following in response to your comments (your comments have been italicized for reference):

> *The U.S. Fish and Wildlife Service (Service) received your letter on July 14, 2013, requesting comment on the proposed development of a 64-unit housing complex on 4.179 acres at the Kulamalu Town Center [TMK (2) 2-3-008:038, 039], on Maui.*

We wish to clarify that the letter sent to you was dated August 13, 2013, the project name is Kulamalu Affordable Housing, and is located at tax map key (TMK): (2) 2-3-066: 012, 013 and 014. The area of the project remains the same at 4.179 acres.

> *To help you minimize potential impacts to listed species, the Service is providing you the following avoidance and minimization measures. Please note that implementation of these measures does not ensure that impacts to listed species can be avoided, and further coordination with the Service on compliance with the ESA may be required.*

The project site has been subject to previous mass grading in 1997. Since the County of Maui acquired the property in 2011, it has commissioned the routine maintenance of the site whereby foliage is trimmed. During the maintenance of the site, no listed, endangered or threatened species have been discovered. However, mitigation measures for potentially impacted, endangered or threatened species set forth by the U. S. Fish & Wildlife Service (USFWS) will be pursued where necessary. USFWS will be contacted if habitat, forage sites, or individual species of the Hawaiian Hoary Bat (*Lasiurus cinereus semotus*), Blackburn's Sphinx Moth (*Manduca blackburni*), and the Hawaiian Goose (*Branta sandvicensis*) are encountered at the project site. The purpose for contacting the USFWS should these species be discovered is to ensure that appropriate mitigative measures can be applied to avoid the potential for adverse effects.

- *The Hawaiian hoary bat is known to occur throughout the island of Maui This bat roosts in both exotic and native woody vegetation and, while foraging, leaves young unattended in "nursery" trees and shrubs. If trees or shrubs suitable for bat roosting are cleared during the hoary bat breeding season (June 1 to September 15), there is a risk that young bats could*

Mr. Loyal Mehroff
Page 2

inadvertently be harmed or killed. As a result, the Service recommends that woody plants greater than 15 feet tall should not be removed or trimmed during the Hawaiian hoary bat breeding season. [added underscore]

The project site has been subject to extensive grading and clearing and it is largely devoid of trees and foliage. All plant life on the project site is routinely maintained by the County of Maui. However, this guidance is acknowledged and will be considered during the scheduling of construction activities to minimize harm to this endangered species.

- *The Blackburn's sphinx moth may presently breed and feed within the proposed action area. Adult moths feed on nectar from native plants, including beach morning glory (Ipomoea pes-caprae), iliee (Plumbago zeylanica), and maiapilo (Capparis sandwichiana); larvae feed upon non-native tree tobacco (Nicotiana glauca) and native aiea (Nothocestrum latifolium). Blackburn's sphinx moth pupae may occupy the soil within 35 feet of larval host plants for up to a year. The Service recommends that a qualified biologist survey the project area, and areas adjacent to the project footprint, for the presence of native and non-native Blackburn's sphinx moth host plants. [added underscore] We also recommend that these surveys be conducted during the wettest portion of the year (usually November-April) and approximately four to eight weeks following a significant rainfall event. Surveys should include looking for eggs, larvae, and signs of larval feeding (chewed stems, frass [SIC], or leaf damage). If presence of the Blackburn's sphinx moth is confirmed, the Service should be contacted for further guidance.*

As noted above, the project site has been extensively cleared, is devoid of much vegetative cover and is routinely maintained by the County of Maui. The areas surrounding the project site have also been cleared and would not appear to provide suitable habitat for the Blackburn's sphinx moth.

- *Due to its range and foraging behavior, the Hawaiian goose may be present in the vicinity of the proposed action at any time of the year. If a Hawaiian goose appears within 100 feet of ongoing construction work, all activity shall be temporarily suspended until the bird moves off to a safe distance of its own volition. Moreover, if any number of Hawaiian geese are observed loafing or foraging within the area of the proposed project during the Hawaiian goose breeding season (October through April), a biologist familiar with the nesting behavior of the Hawaiian goose should survey in and around the proposed construction footprint prior to the resumption of any work, or after any subsequent delay of work of three or more days (during which the birds may attempt to nest). If a nest is discovered within a radius of 150 feet of proposed construction work, or a previously undiscovered nest is found within said radius after work begins, all work must cease immediately and the Service contacted for further guidance.*

This guidance pertaining to the Hawaiian Goose or Nēnē is acknowledged. Since the County of Maui acquired the property in 2011, no signs of the Nēnē have been found. The USFWS shall also be consulted, if required, to ensure that appropriate actions are taken.

Mr. Loyal Mehroff
October 21, 2013
Page 3

- *The Hawaiian petrel and Newell's shearwater, collectively referred to as seabirds, may transit through the proposed action area while flying between the ocean and nesting sites in the mountains during their breeding season (March through December). Seabird fatalities resulting from collisions with artificial structures that extend above the surrounding vegetation have been documented in Hawai'i where high densities of transiting seabirds occur. Additionally, outdoor artificial lighting such as flood lighting for construction work, security, and outdoor illumination can adversely impact seabirds by causing disorientation which may result in collision with utility lines, buildings, fences, and vehicles. Fledging seabirds are especially affected by artificial lighting and have a tendency to exhaust themselves while circling the light sources and become grounded. Too weak to fly, these birds become vulnerable to depredation by feral predators such as dogs, cats, and mongoose. Therefore, the Service recommends that project-related lighting should be minimized. All project-related lights should be shielded so the bulb is not visible at or above bulb-height. [added underscore]*

Project related artificial outdoor lighting will be shielded to cast lighting downward to mitigate any potential impacts to the Hawaiian petrel (*Pterodroma sandwichensis*) and Newell's shearwater (*Puffinus newelli*). The use and need for outdoor lighting will also be minimized as reasonable while addressing safety and security of the public.

The Service also recommends that a biosecurity assessment be conducted to address the potential impacts of invasive species introduction and transport due to the advent of construction-related materials and heavy vehicles into the action area during the construction phase of the proposed project. Accordingly, the Service can provide guidelines for invasive species containment and mitigation through Best Management Practices upon request.

The County of Maui will request-that the contractor implement mitigation strategies to minimize the potential for invasive species introduction due to transportation of construction-related materials and heavy vehicles into the project area during construction. Because the project site is mass graded and has been routinely disturbed for the past few years, a biosecurity assessment is not expected to be required.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Exhibit G—Wild and Scenic Rivers Act [Sections 7 (b), (c)]

State	**Designated National Wild and Scenic Rivers System*** * Source: National Wild and Scenic Rivers System. www.rivers.gov		**Amount of State's Rivers Designated**
Alabama	Spisey Fork of the West Fork River		61.4 miles or approximately 1/10^{ths} of the state's rive miles
Alaska	• Alagnak River • Alatna River • Andreafsky River • Aniakchak River • Beaver Creek • Birch Creek • Charley River • Chilikadrotna River • Delta River • Fortymile River • Gulkana River • Ivishak River	• John River • Kobuk River • Koyukuk River (North Fork) • Mulchatna River • Noatak River • Nowitna River • Salmon River • Selawik River • Sheenjek River • Tinayguk River • Tlikakila River • Unalakleet River • Wind River	3, 210 miles or approximately less than 1% of the state's river miles
Arizona	• Fossil Creek; • Verde River		57.3 miles or 1/10^{ths} of the state's river miles
Arkansas	• Big Piney Creek • Buffalo River • Cossatot River • Hurricane Creek • Little Missouri River	• Mulberry River • North Sylamore Creek • Richland Creek	210 miles or less than 1% of the state's river miles

State	**Designated National Wild and Scenic Rivers System*** * Source: National Wild and Scenic Rivers System. www.rivers.gov		**Amount of State's Rivers Designated**
California	• Amaragosa River • American River (Lower) • American River (North Fork) • Bautista Creek • Big Sur River • Black Butte River • Cottonwood Creek • Eel River • Feather River • Fuller Mill Creek • Kern River • Kings River	• Klamath River • Merced River • Owens River Headwaters • Palm Canyon Creek • Piru Creek • San Jacinto River (North Fork) • Sespe Creek • Sisquoc River • Smith River • Trinity River • Tuolumne River	1,99.6 miles or 1% of the state's river miles
Colorado	• Cache la Poudre River		76 miles or one river, or 1/10^{ths} of the state's river miles
Connecticut	• Eightmile River; • Farmington River		39.3 miles or less than 1% of the state's river miles
Delaware	• White Clay Creek		94.7 miles are designated, or almost 4.5% of the state's river miles
Florida	• Loxahatchee River • Wekiva River		49.2 miles or approximately 1/5th of the state's river miles
Georgia	• Chattooga River		49.2 miles or 7/100^{ths} of 1% of the state's river miles
Hawaii	Hawaii has approximately 3,095 miles of river, but no designated wild & scenic rivers.		N/A

State	Designated National Wild and Scenic Rivers System* * Source: National Wild and Scenic Rivers System. www.rivers.gov		Amount of State's Rivers Designated
Idaho	• Battle Creek • Big Jacks Creek • Bruneau River • Bruneau River (West Fork) • Clearwater River (Middle Fork) • Cottonwood Creek • Deep Creek • Dickshooter Creek • Duncan Creek • Jarbidge River • Little Jacks Creek • Owyhee River	• Owyhee River (North Fork) • Owyhee River (South Fork) • Rapid River • Red Canyon • St. Joe River • Salmon River • Salmon River (Middle Fork) • Sheep Creek • Snake River • Wickahoney Creek	891 miles or less than 1% of the state's river miles
Illinois	• Vermillion River		17.1 miles or approximately 2/100ths of 2/100^{ths} of the state's river miles
Indiana	Indiana has approximately 35,673 miles of river, but no designated wild & scenic rivers.		N/A
Iowa	Iowa has approximately 70,247 miles of river, but no designated wild & scenic rivers.		N/A
Kansas	Kansas has approximately 133,956 miles of river, but no designated wild & scenic rivers.		N/A
Kentucky	• Red River		19.4 miles or 4/100^{ths} of the state's river miles
Louisiana	• Saline Bayou		19 miles of less than 4/100^{ths} of 1% of the state's river miles
Maine	• Allagash Wilderness Waterway		92.5 miles or less than 3/10^{ths} of 1% of the state's river miles
Maryland	Maryland has approximately 16,839 miles of river, but no designated wild & scenic rivers.		N/A
Massachusetts	• Westfield River • Sudbury/Assabet/Concord Rivers • Taunton River		

State	**Designated National Wild and Scenic Rivers System*** * Source: National Wild and Scenic Rivers System. www.rivers.gov			**Amount of State's Rivers Designated**
Michigan	• Au Sable River • Bear Creek • Black River • Carp River • Indian River • Manistee River • Ontonagon River	• Paint River • Pere Marquette River • Pine River • Presque Isle River • Sturgeon River (Hiawatha National Forest) • Sturgeon River (Ottawa National Forest)	• Tahquamenon River (East Branch) • Whitefish River • Yellow Dog River	656.4 miles or a little more than 1% of the state's river miles
Minnesota	• St. Croix River			226 miles or approximately 2/10^{ths} of 1% of the state's river miles
Mississippi	• Black Creek			21 miles or approximately less than 3/100^{ths} of the state's river miles
Missouri	• Eleven Point River			44.4 miles or approximately less than 1/10^{ths} of 1% of the state's river miles
Montana	• Flathead River; Missouri River			368 miles or approximately 2/10^{ths} of 1% of the state's river miles
Nebraska	• Missouri River; • Niobrara River			197 mile or 2/10^{ths} or approximately 2/10^{ths} of 1% of the state's river miles
Nevada	Nevada has approximately 141,796 miles of river, but no designated wild & scenic rivers.			N/A

State	**Designated National Wild and Scenic Rivers System*** • * Source: National Wild and Scenic Rivers System. www.rivers.gov		**Amount of State's Rivers Designated**
New Hampshire	• Lamprey River • Wildcat River		38 miles or approximately 3/10^{ths} of 1% of the state's river miles
New Jersey	• Delaware River (Lower) • Delaware River (Middle) • Great Egg Harbor River	• Maurice River • Musconetcong River	262.9 miles or approximately more than 4% of the state's river miles
New Mexico	• Jemez River (East Fork) • Pecos River • Rio Chama	• Rio Grande	124.3 miles or approximately 1/10th of the state's river miles
North Carolina	• Chattooga River • Horsepasture River • Lumber River	• New River • Wilson Creek	144.5 miles or approximately less than 4/10^{ths} of the state's river miles
North Dakota	• Missouri		93 miles or less than 1% of the state's river miles
Ohio	• Big & Little Darby Creeks • Little Beaver Creek	• Little Miami River	212.9 miles or less than 1% of the state's river miles
Oklahoma	Oklahoma has approximately 78,603 miles of river, but no designated wild & scenic rivers.		N/A

State	Designated National Wild and Scenic Rivers System* * Source: National Wild and Scenic Rivers System. www.rivers.gov			Amount of State's Rivers Designated
Oregon	• Big Marsh Creek • Chetco River • Clackamas River • Clackamas River (South Fork) • Collawash River • Crescent Creek • Crooked River • Crooked River (North Fork) • Deschutes River • Donner und Blitzen River • Eagle Creek (Mt. Hood National Forest) • Eagle Creek (Wallowa-Whitman National Forest) • Elk River • Elkhorn Creek • Fifteenmile Creek • Fish Creek • Grande Ronde River • Hood River (East Fork) • Hood River (Middle Fork) • Illinois River • Imnaha River • John Day River • John Day River (North Fork)	• John Day River (South Fork) • Joseph Creek • Klamath River • Little Deschutes River • Lostine River • Malheur River • Malheur River (North Fork) • McKenzie River • Metolius River • Minam River • North Powder River • North Umpqua River • Owyhee River • Owyhee River (North Fork) • Powder River • Quartzville Creek • Roaring River • Roaring River (South Fork) • Rogue River • Rogue River (Upper) • Salmon River • Sandy River	• Smith River (North Fork) • Snake River • Sprague River • Squaw Creek • Sycan River • Wallowa River • Wenaha River • West Little Owyhee River • Whychus Creek • White River • Wildhorse & Kiger Creeks • Willamette River (North Fork Middle Fork) • Zigzag River	1,916.7 miles or approximately 2% of the state's river miles

State	**Designated National Wild and Scenic Rivers System*** * Source: National Wild and Scenic Rivers System. www.rivers.gov	**Amount of State's Rivers Designated**
Pennsylvania	• Allegheny River • Clarion River • Delaware River (Lower) • Delaware River (Middle) • Delaware River (Upper) • White Clay Creek	409.3 miles or approximately ½ of 1% of the state's river miles
Puerto Rico	• Rio de la Mina • Rio Icacos • Rio Mameyes	8.9 miles or less than 2/10^{ths} of 1% of the commonwealth's river miles
Rhode Island	Rhode Island has approximately 1,392 miles of river, but no designated wild & scenic rivers.	N/A
South Carolina	• Chattooga River	41.9 miles or a little more than 1/10th of the state's river miles
South Dakota	• Missouri	93 miles of less than 1% of the state's river miles
Tennessee	• Obed River	45.3 miles or approximately 7/100^{ths} of 1% of the state's river miles
Texas	• Rio Grande	191.2 miles or 1/10th of 1% of the state's river miles
Utah	• Virgin River	169.3 miles of 2/10^{ths} of 1% of the state's river miles
Vermont	Vermont has approximately 7,099 miles of river, but no designated wild & scenic rivers.	N/A
Virginia	Virginia has approximately 49,350 miles of river, but no designated wild & scenic rivers.	N/A
Washington	• Klickitat River • Skagit River • White Salmon River	197 miles if 3/10^{ths} of 1% of the state's river miles
West Virginia	• Bluestone River	10 miles or 3/100^{ths} of 1% of the state's river miles
Wisconsin	• St. Croix River • Wolf River	276 miles or approximately ½ of 1% of the state's river miles
Wyoming	• Snake River Headwaters • Yellowstone River (Clark's Fork)	408 miles or less than 4/100^{ths} of 1% of the state's river miles

Exhibit H—Noise Abatement and Control [24 CFR 51 B]

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August 13, 2013

Daryn Yamada
Noise Section Supervisor
Indoor and Radiological Health Branch, Noise Section
Department of Health
State of Hawai'i
1250 Punchbowl Street
Honolulu, Hawai'i 96813

Dear Dr. Yamada:

Noise Abatement and Control Consultation (24 CFR 51 B) for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments prior to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

Use of funds from Housing and Urban Development (HUD) requires a Noise Abatement and Control (24 CFR 51 B) Consultation to ascertain if there are residences that could be impacted by excessive noise from this proposed project. It is our preliminary determination that this project will have no adverse impacts because there are no significant fixed noise generators in the vicinity of the project site. Excessive noise associated with construction activities will be confined to the day-night average sound level of 65 and below. Quieter construction equipment and appliances shall be used whenever feasible for the project.

Mr. Daryn Yamada
August 13, 2013
Page 2

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

Exhibit I—Toxic/Hazardous/ Radioactive Materials, Contamination, Chemicals or Gases [24 CFR 58.5(i)(2)]

2024 North King Street
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Project and Construction Management

August 13, 2013

Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, California 94105

To Whom It May Concern:

Request for Determination of Compliance with the Toxic/Hazardous/ Radioactive Materials, Contamination, Chemicals or Gases Act (24 CFR 58.5(i)(2)) for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments prior to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

Use of funds from Housing and Urban Development (HUD) requires Toxic/Hazardous/ Radioactive Materials, Contamination, Chemicals or Gases Act (24 CFR 58.5(i)(2)) consultation to ascertain if the proposed project conforms to the requirements of 24 CFR 58.5(i)(2). The project site is currently vacant and was likely used in the distant past for agricultural uses. There are no known on-site environmental conditions that will adversely affect using this site for a residential shelter, or could adversely impact the health and safety of the occupants. The project site is not known to contain "hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended utilization (24 CFR 58.5(i)(2)."

Environmental Protection Agency
August 13, 2013
Page 2

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

Loretta J. Fuddy, Director
Hazard Evaluation and Emergency Response Office, Department of Health, State of Hawai'i

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:

13-0161
Kulamalu Project

August 23, 2013

Mr. Chester Koga, AICP
R. M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, Hawaii 96819

Dear Mr. Koga:

SUBJECT: Request for Determination of Compliance with the Toxic/Hazardous/Radioactive Materials, Contamination, Chemicals or Gases Act (24 CFR 58.5(i)(2)) for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment
TMK: (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawaii

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your letter dated August 13, 2013. Thank you for allowing us to review and comment on the subject document. The document was routed to the Department of Health's Solid & Hazardous Waste Branch, Indoor Radiological Health Branch, Hazard Evaluation & Emergency Response Office and the Maui District Health Office. They will provide specific comments to you if necessary. EPO recommends that you review the Standard Comments found on our website: http://health.hawaii.gov/epo/home/landuse-planning-review-program/. You are required to adhere to all Standard Comments specifically applicable to this application.

EPO suggests that you examine the many sources available on strategies to support the sustainable design of communities, including the:

- U.S. Environmental Protection Agency's report, "Creating Equitable, Health and Sustainable Communities: Strategies for Advancing Smart Grants, Environmental Justice, and Equitable Development" (Feb. 2013), http://www.epa.gov/smartgrowth/pdf/equitable-dev/equitable-development-report-508-011713b.pdf;
- U.S. Environmental Protection Agency's sustainability programs: www.epa.gov/sustainability;
- U.S. Green Building Council's LEED program: www.new.usgbc.org/leed; and
- World Health Organization, www.who.int/hia.

The DOH encourages everyone to apply these sustainability strategies and principles early in the planning and review of projects. We also request that for future projects you consider conducting a Health Impact Assessment (HIA). More information is available at www.cdc.gov/healthyplaces/hia.htm. We request you share all of this information with others to increase community awareness on sustainable, innovative, inspirational, and healthy community design.

We wish to receive notice of the environmental assessment's availability when it is completed. We request a written response confirming receipt of this letter and any other letters you receive from DOH in regards to this submission. You may mail your response to: 919 Ala Moana Blvd., Ste. 312, Honolulu, Hawaii 96814. However, we would prefer an email submission to epo@doh.hawaii.gov. We anticipate that our letter(s) and your response(s) will be included in the final document. If you have any questions, please contact me at (808) 586-4337.

Mahalo,

Laura Leialoha Phillips McIntyre, AICP
Manager, Environmental Planning Office

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

LORRIN W. PANG, M.D., M.P.H.
DISTRICT HEALTH OFFICER

STATE OF HAWAII
DEPARTMENT OF HEALTH
MAUI DISTRICT HEALTH OFFICE
54 HIGH STREET
WAILUKU, HAWAII 96793

August 28, 2013

Mr. Chester Koga, AICP
Project Coordinator
R. M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, Hawaii 96819

Dear Mr. Koga:

Subject: Request for Determination of Compliance with Toxic/Hazardous/Radioactive Materials, Contamination, Chemicals or Gases Act for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment, Makawao District, Maui, Hawaii TMK: (2) 2-3-066:012, 013, and 014

Thank you for the opportunity to review this project. We have the no comments to offer.

It is strongly recommended that the Standard Comments found at the Department's website: http://health.hawaii.gov/epo/home/landuse-planning-review-program/ be reviewed, and any comments specifically applicable to this project should be adhered to.

Should you have any questions, please call me at 808 984-8230 or E-mail me at patricia.kitkowski@doh.hawaii.gov.

Sincerely,

Patti Kitkowski

Patti Kitkowski
District Environmental Health Program Chief

c EPO

2024 N. King Street
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October 21, 2013

Ms. Laura Leialoha Phillips McIntyre, Manager
Environmental Planning Office
Department of Health
State of Hawai'i
P.O. Box 3378
Honolulu, Hawai'i 96801-3378

Dear Ms. Phillips McIntyre:

Request for Determination of Compliance with the Toxic/Hazardous/ Radioactive Materials, Contamination, Chemicals or Gases Act (24 CFR 58.5(i)(2)) for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated August 23, 2013, concerning the proposed project. We acknowledge the Department of Health's (DOH) standards relating to land use, planning and best management practices. We will further examine your recommended strategies for sustainable design. Comments received by you will be included in the project's Draft Environmental Assessment.

Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

2024 North King Street
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October 21, 2013

Ms. Patti Kitowski, District Environmental Health Program Chief
Maui District Health Office
Department of Health
State of Hawai'i
54 High Street
Wailuku, Hawai'i 96793

Dear Ms. Kitowski:

Request for Determination of Compliance with the Toxic/Hazardous/ Radioactive Materials, Contamination, Chemicals or Gases Act (24 CFR 58.5(i)(2)) for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated August 28, 2013 concerning the proposed project. We acknowledge the Department of Health's (DOH) standards relating to land use, planning and best management practices. We will further examine your recommended strategies for sustainable design. Comments received by you will be included in the project's Draft Environmental Assessment.

Should you wish to provide further input to the proposed project, please contact the undersigned.

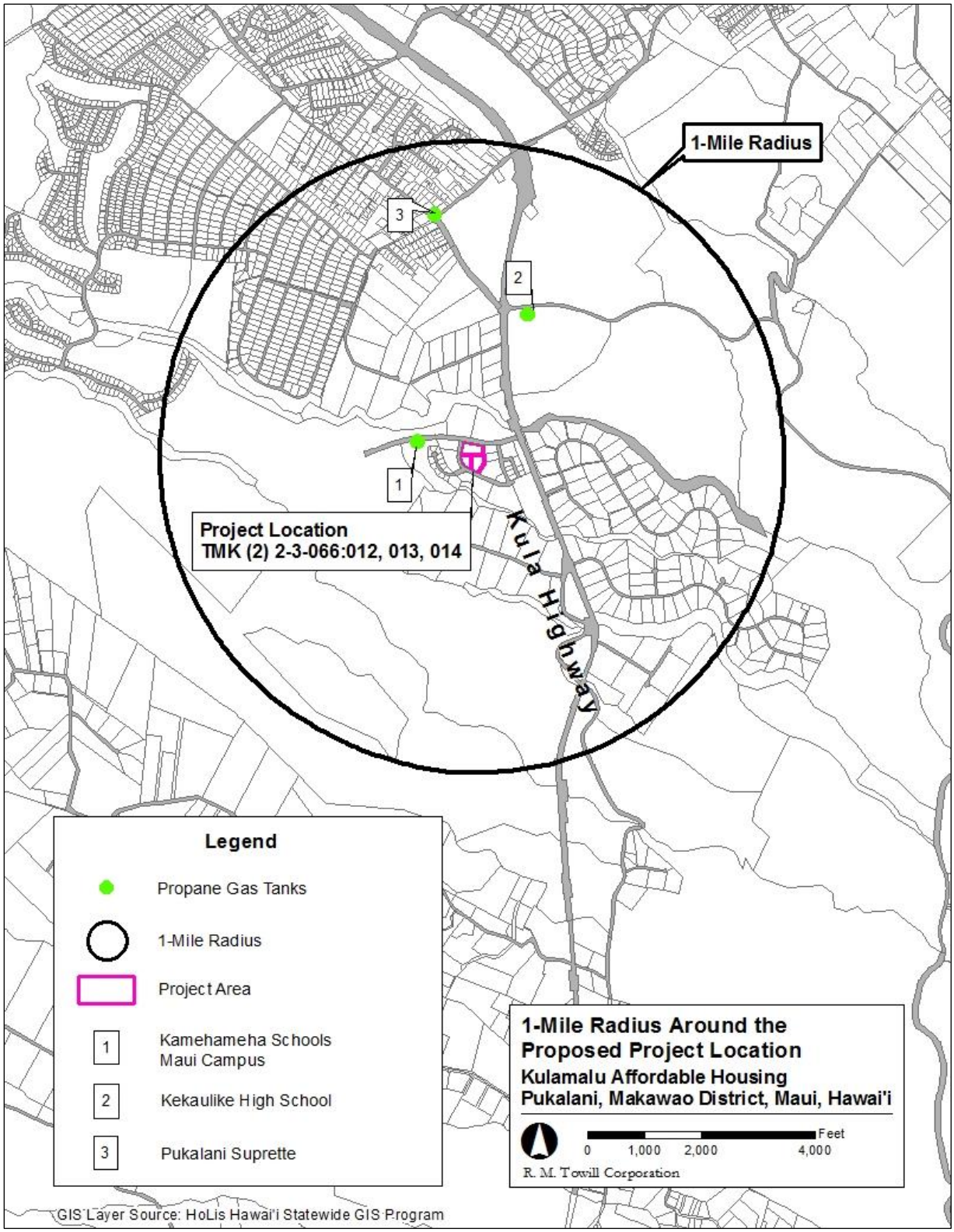
Very truly yours,

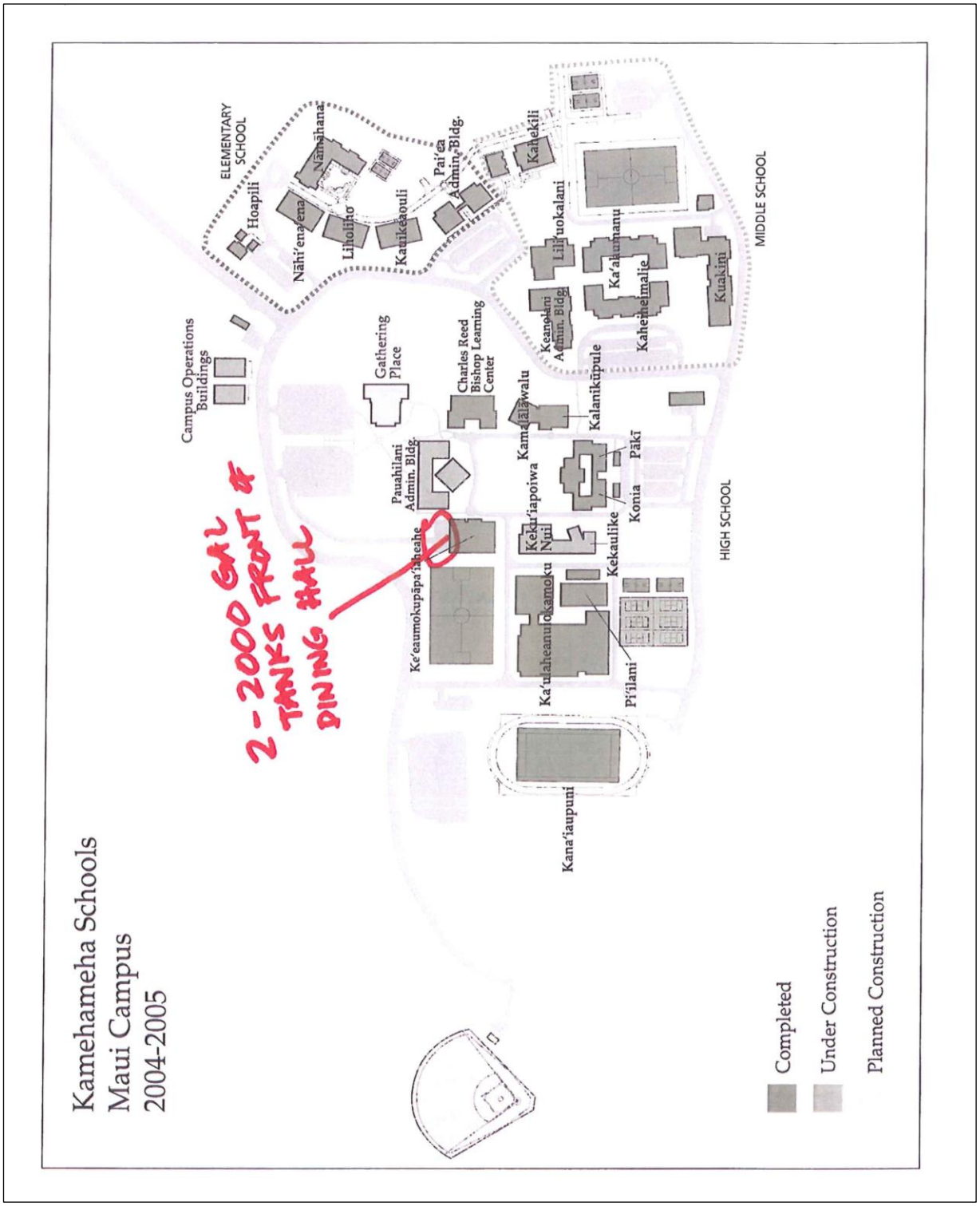
Chester Koga

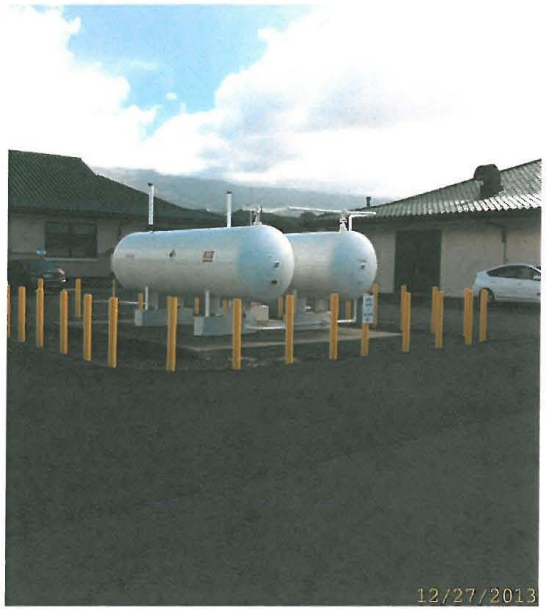
Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Aboveground Storage Tanks (AST) Visual Survey within a One-Mile Radius of The Kulamalu Affordable Housing Project

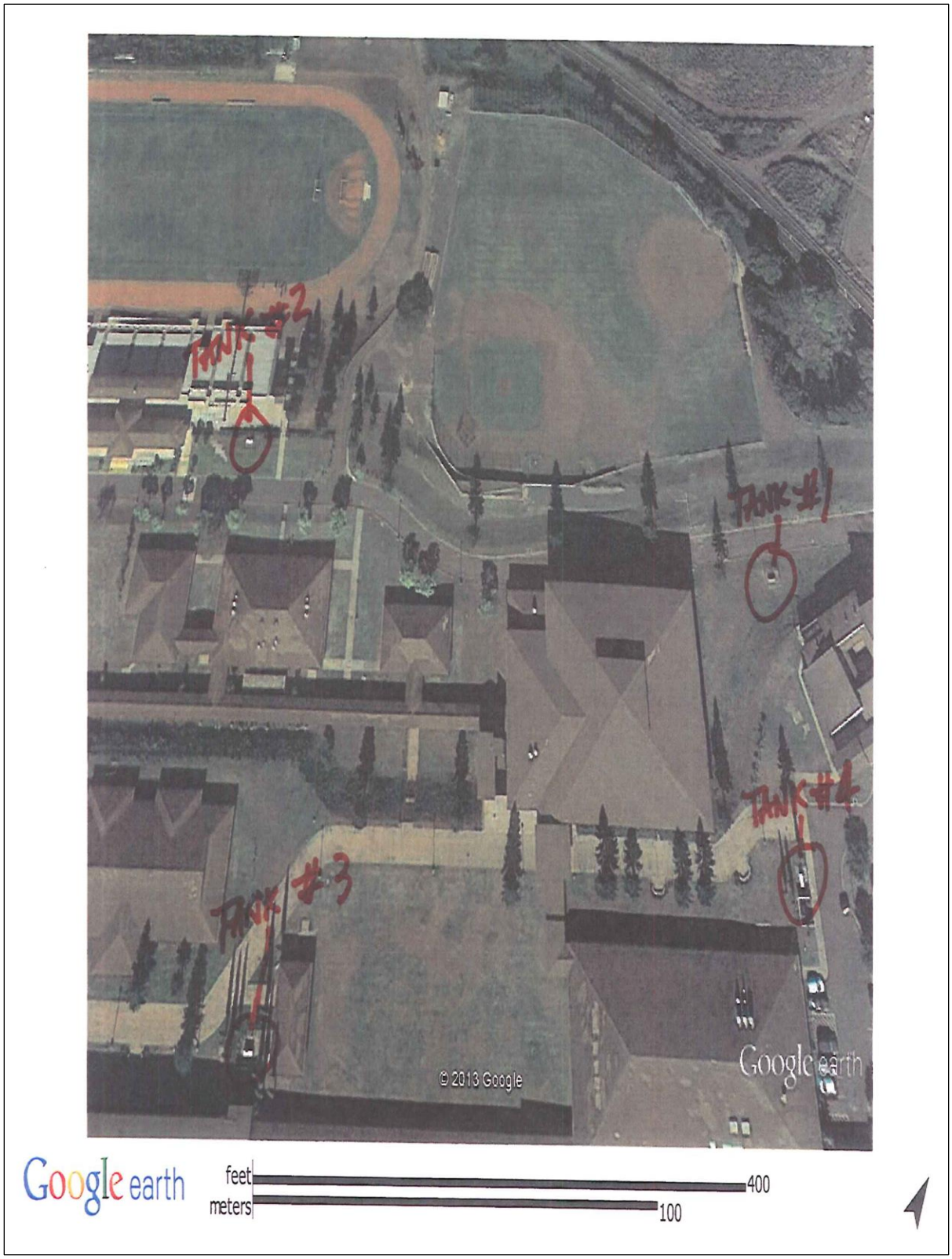

1-Mile Radius
3
2
1
Project Location
TMK (2) 2-3-066:012, 013, 014
Kula Highway
Legend
Propane Gas Tanks
1-Mile Radius
Project Area
1 Kamehameha Schools Maui Campus
2 Kekaulike High School
3 Pukalani Suprette
1-Mile Radius Around the Proposed Project Location
Kulamalu Affordable Housing
Pukalani, Makawao District, Maui, Hawai'i
Feet
0 1,000 2,000 4,000
R. M. Towill Corporation
GIS Layer Source: HoLis Hawai'i Statewide GIS Program

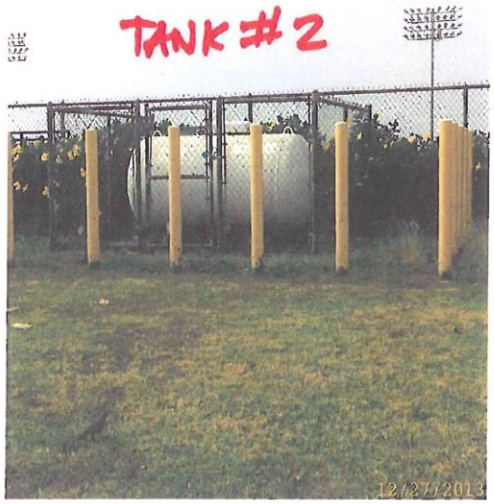

Kamehameha Schools
Maui Campus
2004-2005
ELEMENTARY SCHOOL
Hoapili
Nāhi'ena'ena
Nāmāhana
Liholiho
Kauikeaouli
Pai'ea Admin. Bldg.
Kahekili
Campus Operations Buildings
Gathering Place
Charles Reed Bishop Learning Center
Lili'uokalani
Ka'akumanu
Keanolani Admin. Bldg.
Kaheinelmalie
Kuakini
MIDDLE SCHOOL
Kalanikūpule
Kamehameha
Pauahilani Admin. Bldg.
Pākī
Konia
Keku'iapoiwa Nui
Kekaulike
HIGH SCHOOL
Ke'eaumokupāpa'ineahe
Ka'ulaheanuiokamoku
Pi'ilani
Kana'iaupuni
2-2000 GAL TANKS FRONT OF DINING HALL
Completed
Under Construction
Planned Construction

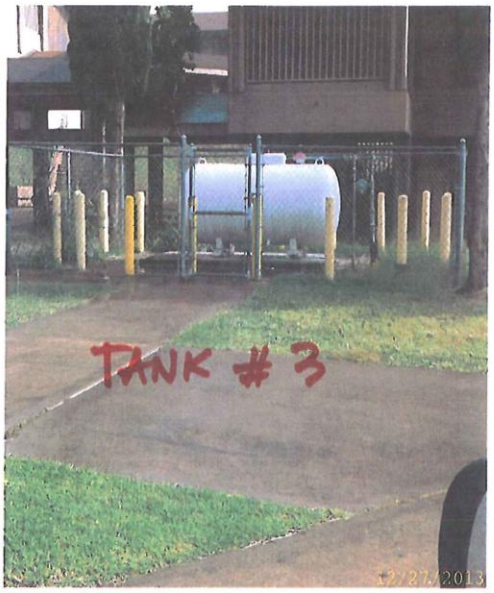


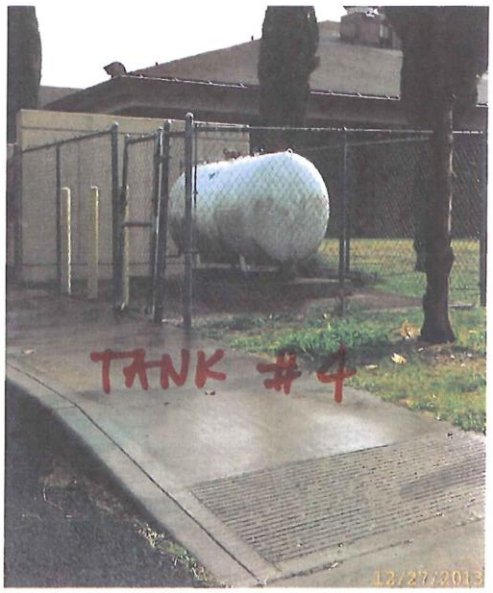
Two 2,000-Gallon Propane Tanks at Kamehameha Schools, Maui Campus.

Two 240-Gallon Propane Tanks at Pukalani Superette.


TANK #2
TANK #1
TANK #4
TANK #3
© 2013 Google
Google earth
Google earth
feet
meters
400
100







Four 499 Gallon Propane Tanks at King Kekaulike High School

Exhibit J – Siting of HUD-Assisted Projects Near Hazardous Operations [24 CFR 51 C]

ACCEPTABLE SEPARATION DISTANCE (ASD) ANALYSIS

Executive Summary

An Acceptable Separation Distance (ASD) Analysis has been prepared in accordance with the 24 CFR Part 51, Subpart C, "Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature" for the proposed Kulamalu Affordable Housing project site. ASD is defined as the siting of HUD-funded projects outside of the area of potential impact of blast overpressure or thermal radiation from stationary facilities that store, handle or process petrochemical liquids and gases in above-ground, stationary containers. The area of potential impact of blast overpressure or thermal radiation is determined through a HUD-proscribed assessment, which in turn defines the types of mitigation strategies available to protect the health, safety and well-being of individuals both indoors and outdoors.

The proposed Kulamalu Affordable Housing project site is identified as TMK (2) 2-3-066: 012, 013, 014 located on ʻŌhiʻa Ku Street in Pukalani, Maui, Hawaii. The proposed development is an urban infill project within the Pukalani Subdivision near the urban core of Wailuku. The project site is consists of vacant land that was mass graded in 1997. Land immediately adjacent to the project site is characterized vacant lots. The University of Hawaiʻi's Institute for Astronomy Maikalani Advanced Technology Research Center is located to the west of the project site, and to the east of the project site is the Kulamalu Shopping Center. Across from ʻA'apueo Parkway and to the northeast of the property is a single-family residential housing area. A mixture of residential, small-scale commercial uses are also found in the vicinity of the project site, including Pukalani town located to its north, separated from the proposed project site by largely undeveloped, vacant terrain.

The results of this Acceptable Separation Distance Analysis indicates that there are hazardous substances stored over ground and within a one-mile radius of the project site capable of producing blast overpressure or thermal radiation in excess of acceptable standards (See *Draft Acceptable Separation Distance Guidebook, 2012, Office of Community Planning and Development Environmental Planning Division, U.S. Department of Housing and Urban Development)* These hazardous substances consist of over ground, undiked propane gas containers which are used for commercial kitchen and food storage purposes. An Acceptable Separation Distance is achieved between the specific, stationary hazards stored within the vicinity of the proposed project area and the proposed project development site.

A. METHODOLOGY

Several methods were utilized to identify the potential location of aboveground storage tanks (AST) within the study area and included, a map was created using the State of Hawai‘i Geographic Information Systems (GIS) and the results inventoried from of a visual survey, sometimes known as a walking site tour, to delineate areas of potential concern within a one-mile radius of the project site. See *Figure 1 – One-Mile Radius Around the Proposed Project Site*. This study area was reviewed to identify potential sites of concern. Properties immediately adjacent to the project site were not identified as containing AST facilities capable of posing a threat. Users of liquid petroleum gas AST, Kamehameha Schools, Maui Campus, Pukalani Superette, and Kekaulike High School are located within a one-mile radius of the project site. See *Appendix A, Exhibit I—Toxic/Hazardous/ Radioactive Materials, Contamination, Chemicals or Gases [24 CFR 58.5(i)(2)], AST Visual Survey*. The HUD ASD Electronic Assessment Tool was used to derive the appropriate distance to position the HUD-assisted Kulamalu Affordable Housing project from above ground stationary containerized hazards of an explosive or fire prone nature (http://www.hud.gov/offices/cpd/environment/asdcalculator.cfm). This online HUD computation tool allows users to differentiate the types of containers to produce results customized to individual cases.

B. FINDINGS

The methodology revealed that there are eight above-ground, containerized propane gas storage tanks at three different sites: (2) Kamehameha Schools, Maui Campus, (2) Pukalani Superette, and (4) at Kekaulike High School. The volume for each AST contains between 124 and 2,000 gallons each. The ruler instrument on Google Earth was utilized to determine an estimated distance between the ASTs identified within a one-mile radius of the proposed Kulamalu Affordable Housing project. Distances from the proposed Kulamalu Affordable Housing project are as follows:

- The Kamehameha Schools, Maui Campus is located more than approximately 2,000 feet;
- The Pukalani Superette is located more than approximately 4,000 feet;
- Kekaulike High School is located approximately 2,000 feet.

Locations of the containerized propane gas storage tanks are well outside the thermal radiation ASD and blast overpressure ASD for the proposed Kulamalu Affordable Housing project.

Because all of the subject storage tanks are located within close proximity to one another at each of the three sites, the propane storage capacities of these above ground containers were combined for and are reflected in the volume imputed within the ASD electronic tool for thermal radiation and blast overpressure calculations for each of

the three sites. Total storage capacity (volume) imputed for each of the three sites are the following:

- 4,000 gallons – Kamehameha Schools, Maui Campus;
- 248 gallons – Pukalani Superette;
- 1,996 gallons – Kekaulike High School.

The results of the ASD assessment reveal that the proposed Kulamalu Affordable Housing is located well within standards deemed acceptable by HUD for blast overpressure and thermal radiation for the proposed HUD-funded Kulamalu Affordable Housing project.

1. <u>Thermal Radiation</u>

The thermal radiation ASD for each of the three sites where actual distances from the hazards to the buildings or open areas where people congregate are the following:

<u>Kamehameha Schools, Maui Campus</u>:

- ASD for Thermal Radiation for People (ASDPPU): 492.74 feet
- ASD for Thermal Radiation for Buildings (ASDBPU): 69.21 feet

<u>Pukalani Superette</u>:

- ASD for Thermal Radiation for People (ASDPPU): 154.71 feet
- ASD for Thermal Radiation for Buildings (ASDBPU): 26.39 feet

<u>Kekaulike High School</u>:

- ASD for Thermal Radiation for People (ASDPPU): 368.85 feet
- ASD for Thermal Radiation for Buildings (ASDBPU): 69.21 feet

2. <u>Blast Overpressure</u>

The blast overpressure ASD for each of the three sites where actual distances from the hazards to the buildings or open areas where people congregate are the following:

<u>Kamehameha Schools, Maui Campus</u>:

- ASD for Blast Overpressure for People and Buildings: 346 feet

<u>Pukalani Superette</u>:

- ASD for Blast Overpressure for People and Buildings: 147 feet

<u>Kekaulike High School</u>:

- ASD for Blast Overpressure for People and Buildings: 275 feet

These figures were derived from the ASD Chart (Blast Overpressure) included within the *Draft Acceptable Separation Distance Guidebook, 2012, Office of Community Planning and Development Environmental Planning Division, U.S. Department of Housing and Urban Development*. Each of the required ASD for the blast overpressure of each of the AST locations,

C. ANALYSIS

HUD-proscribed compliance standards were utilized for this ASD Assessment in a four pronged approach:

1. Identifying hazardous operations/facilities with stationary, AST in proximity to the proposed Kulamalu Affordable Housing project;
2. Calculating the ASD between Kulamalu Affordable Housing and the hazardous facilities;
3. Determining whether the proposed project site meets the ASD standard;
4. Determining the mitigation that may be required in the event that the proposed project does not meet the ASD standard.

Based on the findings from the ASD Assessment, the proposed Kulamalu Affordable Housing project is in compliance with HUD ASD standards. It therefore is does not require any mitigation measures.

Exhibit K –Airport Clear Zones and Accident Potential Zones [24 CFR 51 D]

Airport Clear Zones—Kahului Airport & Its Proximity to Kulamalu Affordable Housing

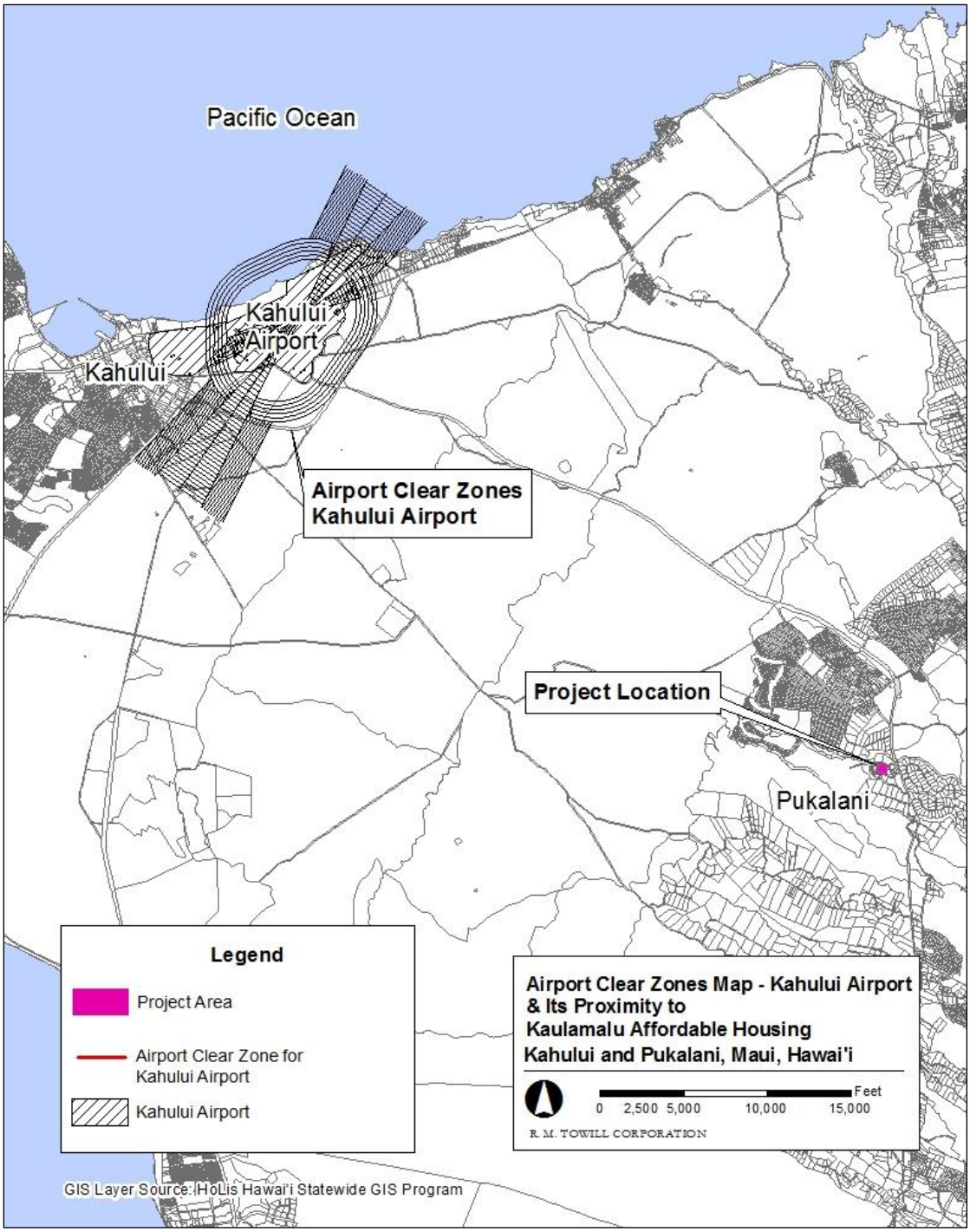


Exhibit L—Slope

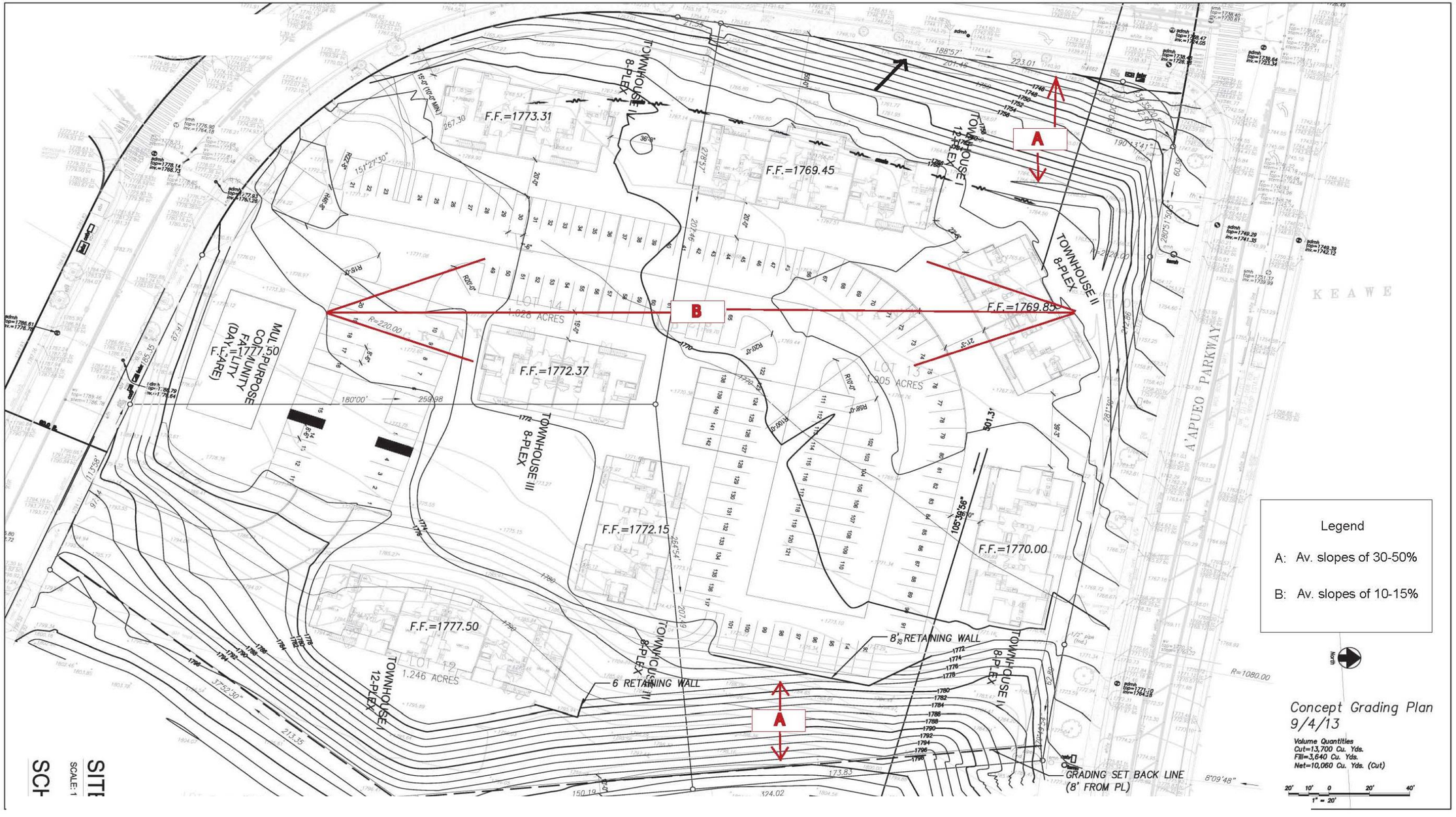

Legend
A: Av. slopes of 30-50%
B: Av. slopes of 10-15%
Concept Grading Plan
9/4/13
Volume Quantities
Cut=13,700 Cu. Yds.
Fill=3,640 Cu. Yds.
Net=10,060 Cu. Yds. (Cut)
F.F.=1773.31
F.F.=1769.45
F.F.=1769.85
F.F.=1772.37
F.F.=1772.15
F.F.=1770.00
F.F.=1777.50
TOWNHOUSE I 8-PLEX
TOWNHOUSE II 8-PLEX
TOWNHOUSE III 8-PLEX
TOWNHOUSE IV 8-PLEX
TOWNHOUSE V 12-PLEX
MULTI-PURPOSE COMMUNITY FACILITY (DAY CARE)
LOT 14 1.628 ACRES
LOT 13 1.905 ACRES
LOT 12 1.246 ACRES
8' RETAINING WALL
6 RETAINING WALL
GRADING SET BACK LINE (8' FROM PL)
A'APUEO PARKWAY
KEAWE
A
B

Exhibit M—Soil Suitability

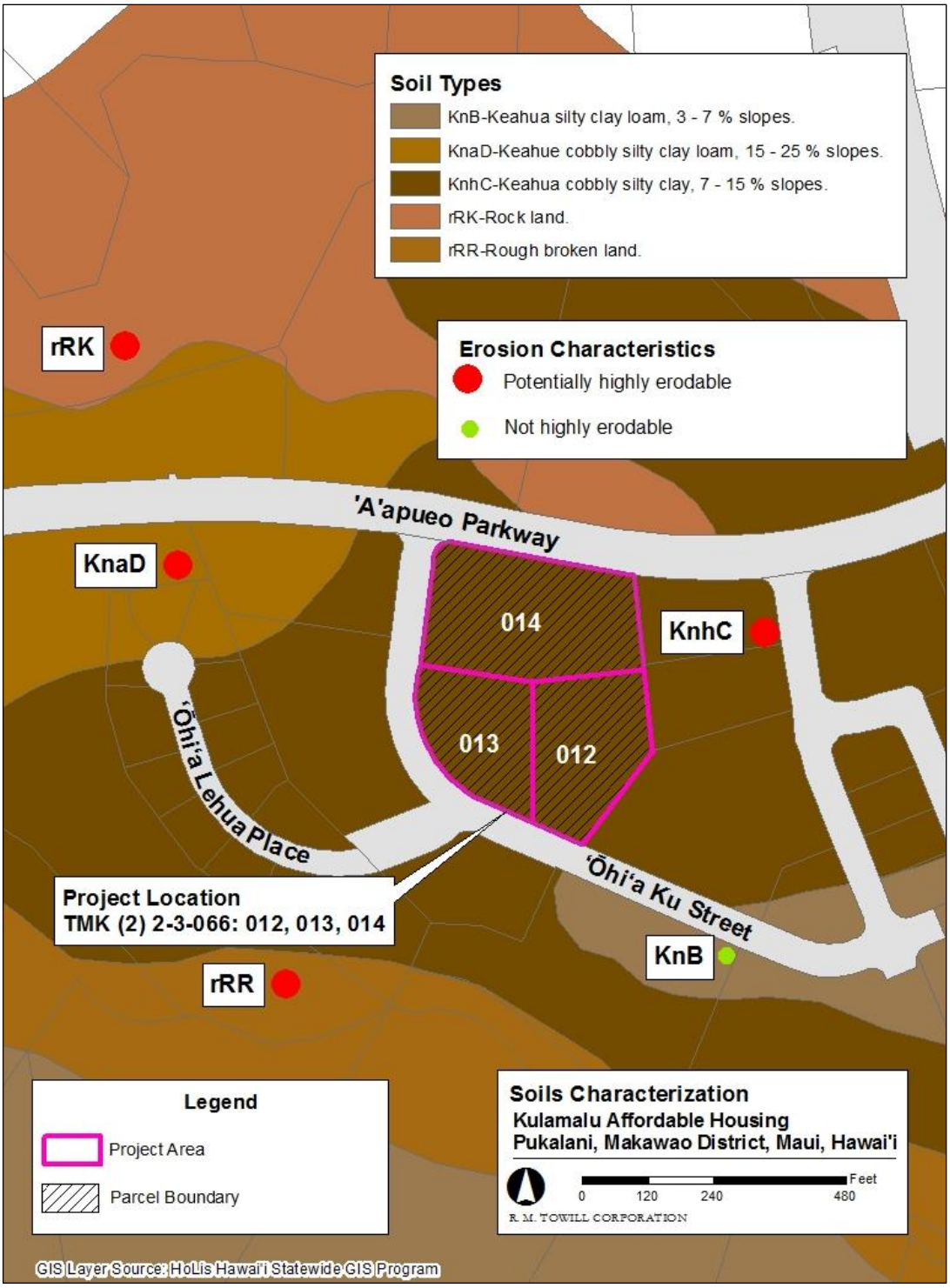

Soil Types
KnB-Keahua silty clay loam, 3 - 7 % slopes.
KnaD-Keahue cobbly silty clay loam, 15 - 25 % slopes.
KnhC-Keahua cobbly silty clay, 7 - 15 % slopes.
rRK-Rock land.
rRR-Rough broken land.
Erosion Characteristics
Potentially highly erodable
Not highly erodable
rRK
KnaD
KnhC
KnB
rRR
'A'apueo Parkway
'Ōhi'a Lehua Place
'Ōhi'a Ku Street
014
013
012
Project Location
TMK (2) 2-3-066: 012, 013, 014
Legend
Project Area
Parcel Boundary
Soils Characterization
Kulamalu Affordable Housing
Pukalani, Makawao District, Maui, Hawai'i
Feet
0
120
240
480
R. M. TOWILL CORPORATION
GIS Layer Source: HoLis Hawai'i Statewide GIS Program

Exhibit N—Hazards and Nuisances including Site Safety

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Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Project and Construction Management

August 13, 2013

Gary Yabuta
Chief of Police
Police Department
County of Maui
255 Mahalani Street
Wailuku, Hawai'i 96793

Dear Chief Yabuta:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments prior to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

The proposed Kulamalu Affordable Housing project will add about two residents per household or approximately 128 inhabitants to Pukalani. This population increase is not anticipated to significantly alter the nature of police protection already provided by the Police substation located approximately two miles away at the Eddie Tam Park Community Center.

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Chief Gary Yabuta
August 13, 2013
Page 2

Very truly yours,

Chester Koga, AICP
Project Coordinator

Attachments
cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

POLICE DEPARTMENT

COUNTY OF MAUI

ALAN M. ARAKAWA
MAYOR

OUR REFERENCE

YOUR REFERENCE

55 MAHALANI STREET
WAILUKU, HAWAII 96793
(808) 244-6400
FAX (808) 244-6411

GARY A. YABUTA
CHIEF OF POLICE

CLAYTON N.Y.W. TOM
DEPUTY CHIEF OF POLICE

September 13, 2013

Mr. Chester Koga, AICP
Project Coordinator
R.M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, HI 96819-3494

Dear Mr. Koga:

SUBJECT: Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013, and 014, Makawao District

This is in response to your letter dated August 13, 2013, requesting comments and information on the above project.

We have reviewed the information submitted and have enclosed a copy of a report submitted by Officer Marjorieann Kahookele-Pea from the Wailuku District.

Thank you for giving us the opportunity to comment on this project.

Sincerely,

Assistant Chief Victor K. Ramos
for: Gary A. Yabuta
Chief of Police

c: William Spence, Dept. of Planning
Jo-Ann Ridao, Dept. of Housing and Human Concerns

Enclosure

TO : **GARY YABUTA, CHIEF OF POLICE, COUNTY OF MAUI**

VIA : **CHANNELS**

FROM : **MARJORIEANN KAHOOKELE-PEA, POIII, COMMUNITY POLICE OFFICER**

SUBJECT : **PUBLIC REVIEW OF DRAFT ENVIRONMENTAL ASSESSMENT (DEA) FOR PROPOSED KULAMALU AFFORDABLE HOUSING, ISLAND OF MAUI, HAWAII**

This communication is submitted as a response to a request for review and comment for public review of Draft Environmental Assessment (DEA) for proposed Kulamalu Affordable Housing on the Island of Maui, Hawaii. The request was sent by Chester KOGA of R. M. Towill Corporation, AICP, Project Coordinator.

PROJECT	:	Central Maui Regional Park
TMK #	:	(2) 3-8-007:101
APPLICANT	:	Department of Housing and Human Concerns County of Maui Attention: Jo-Ann RIDAO, Director of DHHC
CONSULTANT	:	R. M. Towill Corporation Attention: Chester Koga

PROJECT INFORMATION:

The proposed Kulamalu Affordable Housing project consists of the building of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways on a 4.179 acre project site located in Pukalani within the Kulamalu Town Center. This project expects each unit to only house about two residents per household increasing the population to about 128 therefore not significantly altering the need for police protection. The project is scheduled to begin in late to mid 2014.

The project is located within the 53.67 acre Kulamalu Town Center, TMK (2) 2-3-006:012, 013, and 014. This project will be located on the corner of 'A'a Pueo Parkway and Ohi'a Ku Street, across from the University of Hawaii Astronomy Center.

RESPONSE:

In review of the submitted documents, concerns from the police perspective are upon the safety of pedestrian and vehicular movement and with the expansion of the population in the area, additional police protection may be required for the area. There will be an increase in pedestrian and vehicular traffic in the Kulamalu area as a result of the project as well as another proposed project of an elderly housing complex. The affordable housing currently estimates each unit housing only 2 (two) occupants however, many homes house several occupants, including children. The increased population would be estimated at more than 128. Many families also have multiple cars which would increase traffic in this area.

Currently, there are sidewalks, lighting and one exit/entry into Kulamalu area via the intersection of 'A'apueo Parkway and Kula Highway that is used. There is no other alternative routes. Due to the current heavy traffic flow during the before and after school and work hours in this area, I would recommend that an alternative exit/entry into the Kulamalu Area be developed to include another alternative route to the proposed project so traffic may avoid 'A'apueo Parkway which access to Kamehameha Schools is made. This additional housing as well as the additional housing for proposed elderly home, will affect calls for service as well as congest traffic further.

CONCLUSION:

There are no objections to the progression of this project at this time however, from the police standpoint, in regards to pedestrian and vehicular movement, it is recommended that alternative routes be examined for smooth flow and avoidance of any further congestion.

Respectfully Submitted,

Of. Marjorieann L. KAHOOKELE-PEA 15206
Community Oriented Police
September 3rd, 2013@ 1142 Hours

SUGGEST THE RECOMMENDATIONS PROVIDED BY OFF. KAHOOKELE-PEA BE TAKEN INTO CONSIDERATION.
Sgt. [illegible]
9-5-13 @ 1500

Officer KAHOOKELE-PEA addresses several significant concerns regarding an environmental assessment of the Kulamalu Affordable Housing Project.

Lt. Arthur G. DADEZ E-8480
09/07/2013 @ 0512 Hrs

For review of Comments submitted
OK
9/13/13

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October 21, 2013

Mr. Gary Yabuta, Chief of Police
Police Department
County of Maui
255 Mahalani Street
Wailuku, Hawai'i 96793

Dear Mr. Yabuta:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 13, 2013 and for forwarding Community Police Officer Majorieann Kahookele-Pea's letter dated September 10, 2013. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *In review of the submitted documents, concerns from the police perspective are upon the safety of pedestrian /and vehicular movement and with the expansion of the population in the area, additional police protection may be required for the area. There will be an increase in pedestrian and vehicular traffic in the Kulamalu area as a result of the project as well as another proposed project of an elderly housing complex. The affordable housing currently estimates each unit housing only 2 (two) occupants however, many homes house several occupants, including children. The increased population would be estimated at more than 128. Many families also have multiple cars which would increase traffic in this area.*

We acknowledge your concerns about the potential need for expanded police protection to maintain the safety of pedestrians and vehicles. The Draft Environmental Assessment will address all necessary and feasible precautions to ensure that pedestrian and vehicular traffic will not impose an additional burden on police service in the area.

> *Currently, there are sidewalks, lighting and one exit/entry into Kulamalu area via the intersection of 'A'apueo Parkway and Kula Highway that is used. There is no other alternative routes. Due to the current heavy traffic flow during the before and after school and work hours in this area, I would recommend that an alternative exit/entry into the Kulamalu Area be developed to include another alternative route to the proposed project so traffic may avoid 'A'apueo Parkway which access to Kamehameha Schools is made. This additional housing as well as the additional housing for proposed elderly home, will affect calls for service as well as congest traffic further.*

Mr. Gary Yabuta, Chief
Page 2

We acknowledge your concerns regarding the potential for increased vehicular traffic within the intersection of 'A'apueo Parkway and Kula Highway. Due to budgetary constraints of the proposed affordable housing project, it is infeasible to construct an alternative intersection to the 'A'apueo Parkway and Kula Highway.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Exhibit O—Educational Facilities

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August 13, 2013

Katharyn Matayoshi
Superintendent
Department of Education
State of Hawai'i
1390 Miller Street
Honolulu, Hawai'i 96813

Dear Ms. Matayoshi:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments prior to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

The proposed Kulamalu Affordable Housing project will add about two residents per household or approximately 128 inhabitants to Pukalani. This population increase is not anticipated to place significant additional demand on Department of Education Schools in the area.

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Ms. Katharyn Matayoshi
August 13, 2013
Page 2

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

Alvin Shima, Complex Area Superintendent
Baldwin-Kekaulike-Maui, Department of Education

NEIL ABERCROMBIE
GOVERNOR

KATHRYN S. MATAYOSHI
SUPERINTENDENT

STATE OF HAWAI`I
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAI`I 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

August 29, 2013

Mr. Chester Koga
Project Coordinator
R.M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, Hawaii 96707

Dear Mr. Koga:

SUBJECT: **Consultation Prior to the Draft Environmental Assessment for Kulamalu Affordable Housing, Makawao District, Maui, Hawaii**

The Department of Education (DOE) is responding to your letter of August 13, 2013 requesting preliminary comments on a proposed housing project with 64 multi-family units in Pukalani, Maui. There is sufficient space in the DOE schools that serve Pukalani to accommodate students who will live in the project.

Thank you for this opportunity to offer our comments. Should you have any questions, please call Heidi Meeker of the Facilities Development Branch at 377-8301.

Respectfully,

Kenneth G. Masden
Public Works Manager
Planning Section

KGM:jmb

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

2024 North King Street
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October 21, 2013

Ms. Katharyn Matayoshi, Superintendent
Department of Education
State of Hawai'i
1390 Miller Street
Honolulu, Hawai'i 96813

Dear Ms. Matayoshi:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated August 29, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *There is sufficient space in the DOE schools that serve Pukalani to accommodate students who will live in the project.*

Thank you for informing us that the State of Hawai'i Department of Education (DOE) has sufficient space in the DOE schools that serve the Pukalani area to accommodate students who will live in the project.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Alvin Shima, Complex Area Superintendent
Baldwin-Kekaulike-Maui, Department of Education

Exhibit P—Solid Waste and Waste Water

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August 13, 2013

Kyle Ginoza
Director
Environmental Management
County of Maui
200 South High Street, 7th Floor
Wailuku, Hawai'i 96793

Dear Mr. Ginoza:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments prior to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

The project site currently does not generate any wastewater because it is undeveloped. It is anticipated that once constructed, the proposed project will generate approximately 12,800 gpd[2] of wastewater. Wastewater generated from the project will go to the project's sewer collection system that will connect to a Hawai'i Water Services facility and will be handled appropriately thereafter.

[2] Estimate is based on the 6,000 gallon per month ceiling charge for multi-family housing dwellings. This amount is multiplied by the number of units (64) that will be constructed at Kulamalu Affordable Housing. Source: County of Maui Department of Environmental Management Wastewater Services Information. Retrieved from: http://www.mauicounty.gov/index.aspx?NID=808

My Kyle Ginoza
August 13, 2013
Page 2

Solid waste collection for the project will be provided by a commercial waste disposal service and is not anticipated to significantly impact the long-term capacity of the County's Central Maui Landfill. According to the County of Maui Integrated Solid Waste Management Plan (2009), existing capacity at the Central Maui Landfill is expected to run out in 2026. The proposed project is expected to be constructed and occupied well before additional solid waste capacity will be required for the Central Maui Landfill.

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

ALAN M. ARAKAWA
Mayor
KYLE K. GINOZA, P.E.
Director
MICHAEL M. MIYAMOTO
Deputy Director

TRACY TAKAMINE, P.E.
Solid Waste Division
ERIC NAKAGAWA, P.E.
Wastewater Reclamation Division

COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
2200 MAIN STREET, SUITE 100
WAILUKU, MAUI, HAWAII 96793

October 10, 2013

Mr. Chester Koga
R.M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, Hawaii 96819

Dear Mr. Koga:

SUBJECT: KULAMALU AFFORDABLE HOUSING
EARLY CONSULTATION FOR DRAFT EA
TMK (2) 2-3-066:012, 013, AND 014, MAKAWAO, MAUI

We reviewed the subject application and have the following comments:

1. Solid Waste Division comments:

   a. Include a plan for construction waste management.

2. Wastewater Reclamation Division (WWRD) comments:

   a. The County does not have a wastewater system in the area of the subject project.

If you have any questions regarding this memorandum, please contact Michael Miyamoto at 270-8230.

Sincerely,

KYLE K. GINOZA, P.E.
Director of Environmental Management

xc: Jo-Ann Ridao, Director
County of Maui
Department of Housing and Human Concerns
One Main Plaza
2200 Main Street, Suite 546
Wailuku, Hawaii 96793

2024 North King Street
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Project and Construction Management

October 21, 2013

Mr. Kyle K. Ginoza, P.E., Director
Department of Environmental Management
2200 Main Street, Suite 100
Wailuku, Hawai'i 96793

Dear Mr. Ginoza,

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter of October 10, 2013. In response to your comments, we offer the following:

1. Include a plan for construction waste management.
   Response: The project contractor will be responsible for the proper disposal of construction waste.

2. The County does not have a wastewater system in the area of the subject projects.
   Response: Wastewater from the subject project will be accommodated by a private system in the Pukalani area.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Exhibit Q—Water Supply

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Project and Construction Management

August 13, 2013

David Taylor
Director
Department of Water Supply
County of Maui
Kalana o Maui Building
200 South High Street, 5th Floor
Wailuku, Hawai'i 96793

Dear Mr. Taylor:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments prior to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

Water mains on the project site will hook up to the four existing water meters on the project's periphery. The projected water demand of Kulamalu Affordable Housing is estimated to range between 25,600—26,000 gallons per day (gpd)[1]. Recent water quantity and quality testing confirms ample capacity and good quality of drinking water sources in the Makawao-Kula-Pukalani District.

[1] The lowest estimate for gpd was calculated based on the assumption that each of the 64 housing units will have 2 occupants total, also using 200 gpd each, a conventional estimate used to calculate water demand. The highest estimate of gpd is based on a generous assumption that there will be 133 new residents for each parking stall at Kulamalu Affordable Housing and that each resident will use 200 gpd.

Mr. David Taylor
August 13, 2013
Page 2

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

ALAN M. ARAKAWA
Mayor

DAVID TAYLOR, P.E.
Director

PAUL J. MEYER
Deputy Director

DEPARTMENT OF WATER SUPPLY
COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793-2155
www.mauiwater.org

September 20, 2013

Mr. Chester Koga, AICP, Project Coordinator
R. M. Towill Corporation
2024 North King Street, Ste. 200
Honolulu, HI 96819-3494

Dear Mr. Koga:

RE: Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066:012, 013, and 014, Makawao District, Maui, Hawai'i

Thank you for the opportunity to provide the following comments on the referenced project.

Background
The project site is served by the Department of Water Supply's (DWS) Lower Kula water system, 12-inch waterlines on Aapueo Parkway and Ohia Ku Street, fire hydrants numbers 473, 662, 663, 664, and 665, and four ¾-inch meters. Storage is provided by the one million gallon Kealaloa tank.

The consultant's projected water demand for the 64-unit project is estimated between 25,600-26,000 gallons per day or approximately 400 gallons per day per unit.

Conclusion and Recommendations
During the building permit process, the applicant will be required to submit domestic and irrigation calculations, approved, and stamped by a licensed architect or engineer, to determine the adequacy of the water meters for the project.

The DWS' goal is to protect the integrity of surface and groundwater resources. To achieve this, mitigation measures must be implemented to prevent any potential water pollution related impacts. Best management practices for construction should, therefore, be applied during construction.

The DWS encourages the applicant to consider the following measures in the

"By Water All Things Find Life"

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Mr. Chester Koga
Page 2
September 20, 2013

project design, as well as during construction:

- Utilize reclaimed or non-potable water for dust control, irrigation, and other non-potable uses.
- Water after 7:00 p.m. at night and before 10:00 a.m. in the morning.
- Prevent over-watering by automated systems – Provide rain-sensors on all automated irrigation controllers. Check and reset controllers at least once a month to reflect monthly changes in evaporation rates at the site. As an alternative, provide more automated, soil-moisture sensors on controllers.
- Maintain fixtures to prevent leaks – A simple, regular program of repair and maintenance can prevent the loss of hundreds or even thousands of gallons per day.
- Limit irrigated turf – Low-water use shrubs and ground cover can be equally attractive and require substantially less water than turf.
- Select climate adapted native plant species for landscaping – Native plants adapted to the area conserve water and protect the watershed from degradation due to invasive alien species.

Should you have any questions, please contact Arnold Y. Imaye, Staff Planner at Arnold.Imaye@maui.co.hi.us or at (808) 463-3110.

Sincerely,

David Taylor, P.E., Director
ayi
c: DWS Engineering Division
Jo-Ann Ridao, Director, Department of Housing and Human Concerns
DWS Water Resources & Planning Division files

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

R. M. TOWILL CORPORATION
SINCE 1930

Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Project and Construction Management

October 21, 2013

Mr. David Taylor, Director
Department of Water Supply
County of Maui
Kalana o Maui Building
200 South High Street, 5th Floor
Wailuku, Hawai'i 96793

Dear Mr. Taylor:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 20, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

Conclusion and Recommendations
During the building permit process, the applicant will be required to submit domestic and irrigation calculations, approved, and stamped by a licensed architect or engineer, to determine the adequacy of the water meters for the project.

We acknowledge that all necessary documentation should be submitted in support of the building permit application.

Conclusion and Recommendations
The DWS' goal is to protect the integrity of surface and groundwater resources. To achieve this, mitigation measures must be implemented to prevent any potential water pollution related impacts. Best management practices for construction should, therefore, be applied during construction.

Mitigation measures will be implemented to prevent any potential water pollution related impacts. Best management practices (BMPs) for construction will be applied by the contractor during construction.

The DWS encourages the applicant to consider the following measures in the project design, as well as during construction:
o Utilize reclaimed or non-potable water for dust control, irrigation, and other non-potable uses.
o Water after 7:00 p.m. at night and before 10:00 a.m. in the morning.
o Prevent over-watering by automated systems - Provide rain-sensors on all automated irrigation controllers. Check and reset controllers at least once a month to reflect monthly changes in evaporation rates at the site. As an alternative, provide more automated, soil-moisture sensors on controllers.

Mr. David Taylor
October 21, 2013
Page 2

- *o Maintain fixtures to prevent leaks - A simple, regular program of repair and maintenance can prevent the loss of hundreds or even thousands of gallons per day.*
- *o Limit irrigated turf - Low-water use shrubs and ground cover can be equally attractive and require substantially less water than turf.*
- *o Select climate adapted native plant species for landscaping - Native plants adapted to the area conserve water and protect the watershed from degradation due to invasive alien species.*

The suggested mitigative measures above are noted. The investigation of alternatives to mitigate the potential for adverse impacts to water use and water quality in the Draft Environmental Assessment will include a description of BMPs to address these concerns.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Exhibit R—Public Safety—Fire

2024 North King Street
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Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

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Surveying
Project and Construction Management

August 13, 2013

Jeffrey A. Murray
Fire Chief
Fire and Public Safety
County of Maui
200 Dairy Road
Kahului, Hawai'i 96733

Dear Chief Murray:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

This letter is an attempt to solicit comments pursuant to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

The proposed Kulamalu Affordable Housing project will add about two residents per household or approximately 128 inhabitants to Pukalani. This population increase is not anticipated to significantly alter demand for fire and public safety already provided by the Makawao Fire station located approximately one away.

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Chief Jeffrey A. Murray
August 13, 2013
Page 2

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

Chester Koga

From: Peter Davis <Peter.Davis@co.maui.hi.us>
Sent: Friday, August 30, 2013 8:43 AM
To: Chester Koga
Subject: Emailing: KD- Early Consultation for the proposed Kulamalu Affordable Housing DEA0.wpd
Attachments: WordPerfect 6.1

Sorry, the first letter was dated wrong.

The message is ready to be sent with the following file or link attachments:

KD- Early Consultation for the proposed Kulamalu Affordable Housing DEA0.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Lt. P. Kono Davis

County of Maui
Department of Fire
and Public Safety

Fire Prevention Bureau
313 Manea Pl.
Wailuku, HI 96793

808-244-9161 ext.25
808-244-1363 Fax
808-357-5036 Cell

Peter.Davis@co.maui.hi.us

1

Date: August 30, 2013

To: R.M. Towill Corporation
Chester Koga, AICP
2024 North King Street, suite 200
Honolulu, HI 97819

Subject: Early Consultation for the proposed Kulamalu Affordable Housing DEA
Makawao District, Maui, Hawaii
(2) 2-3-066:012, 013 and 014

Dear Chester,

Thank you for allowing the Fire Prevention Bureau the opportunity to comment on the above said project. Our department reserves the right to comment officially during the plan review process.

If there are more than 14 dwelling units in one building, the possibility of fire sprinklers for fire protection may be implemented. Without seeing an actual plan, we can safely say that the fire flow for this project may range between 1500 GPM's to 2000 GPM's, depending on the approach of the fire protection.

Please be aware that by June of 2014, the County of Maui, will be under a new fire code with amendments. The Hawaii State Fire Code, based on the NFPA 1 Uniformed Fire Code 2006, along with the County of Maui's amendments will be in effect.

If there are any questions, please feel free to contact me by mail or at 244-9161 ext. 25.

Sincerely,

Kono Davis
Lieutenant, Fire Prevention Bureau

cc: Jo-Ann Ridao, Director
Department of Housing & Human Concerns
County of Maui
313 Manea Place
Wailuku, HI 96793

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
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R. M. TOWILL CORPORATION
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Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Project and Construction Management

October 21, 2013

Mr. Jeffrey A. Murray, Fire Chief
Fire and Public Safety
County of Maui
200 Dairy Road
Kahului, Hawai'i 96733

Dear Mr. Murray:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated August 30, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *Our department reserves the right to comment officially during the plan review process.*

Your right to comment officially during the plan review process is acknowledged. You will receive a copy of the Draft Environmental Assessment upon its availability.

> *If there are more than 14 dwelling units in one building, the possibility of fire sprinklers for fire protection may be implemented. Without seeing an actual plan, we can safely say that the fire flow for this project may range between 1500 GPMs to 2000 GPMs, depending on the approach of the fire protection.*

For buildings comprised of more than 14 dwelling units, the use of fire sprinklers will be considered among the possible options for fire protection. Fire protection that is provided for Kulamalu Affordable Housing will comply with the most up to date County of Maui Code.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Exhibit S— Open Space and Recreation—Open Space

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Planning
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Project and Construction Management

August 13, 2013

Dan Quinn
Administrator
Division of State Parks
Department of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, Hawai'i 96793

Dear Mr. Quinn:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawai'i

The purpose of this letter is to solicit comments prior to the preparation of a Draft Environmental Assessment for the proposed project. The Department of Housing and Human Concerns, County of Maui, proposes to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways. The 4.179-acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. See **Attachment 1, Project Location** and **Attachment 2, Conceptual Site Plan**. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. The purpose of this project is to alleviate some of the demand for affordable housing on Maui. Construction is anticipated to begin in mid-to-late 2014.

The proposed Kulamalu Affordable Housing project will add about two residents per household or approximately 128 inhabitants to Pukalani. This population increase is not anticipated to significantly increase demand for facilities in the nearby Upcountry County parks; Mayor Hannibal Tavares Community Center and upcountry Pool, Harold Rice Park and Eddie Tam Park. The proposed Kulamalu Affordable Housing project will also include open space resources and landscaping. This will provide ample recreational spaces for residents of the proposed project.

Mr. Dan Quinn
August 13, 2013
Page 2

Thank you for this opportunity to inform you of this important project. Should you wish to provide input to the proposed project please send your comments within 30 days of the receipt of this letter to the undersigned at R. M. Towill Corporation, 2024 North King Street, Suite 200, Honolulu, Hawai'i 97819 or e-mail chesterk@rmtowill.com. You may also write Ms. Jo-Ann Ridao, Director, Department of Housing and Human Concerns, County of Maui, at 2200 Main Street, One Main Plaza, Suite 546, Wailuku, Hawai'i 96793.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

Attachments

cc: Jo-Ann Ridao, Director
Department of Housing and Human Concerns, County of Maui

Glenn Correa, Director
County of Maui, Parks and Recreation

ALAN M. ARAKAWA
Mayor

GLENN T. CORREA
Director

BRIANNE SAVAGE
Deputy Director

(808) 270-7230
FAX (808) 270-7934

DEPARTMENT OF PARKS & RECREATION
700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

September 16, 2013

Chester Koga, AICP
R. M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, HI 96819

Dear Mr. Koga:

SUBJECT: Draft Environmental Assessment for Proposed Kulamalu Affordable Housing, Makawao, Maui, Hawaii
TMK (2) 2-3-066:012, 013, 014

Thank you for the opportunity to review the subject Early Consultation Request.

The fiscal year 2013-2014 park assessment fee rate for the Makawao-Pukalani-Kula Community Plan Area is $4,980.00 per unit. Since the 3-unit exemption for this property has been used, all 64 dwelling units will be subject to the park assessment fee. The total fee would be $318,720.00.

Be advised that the aforementioned rate and fees are valid through June 30, 2014, and are subject to change thereafter. Also, the applicant is required to satisfy the applicable park dedication requirements in effect at the time of final subdivision approval, or in this case, issuance of building permit.

Should you have any questions or concerns, please feel free to contact me, or Steve Grogan, Capital Improvements Project Coordinator, at stephen.grogan@co.maui.hi.us or 808-270-6158.

Sincerely,

GLENN T. CORREA
Director of Parks & Recreation

c: Robert Halvorson, Chief of Planning & Development
GTC:RH:sg

S:\PLANNING\Steve G\No Objections\No Objections - Draft EA - Kulamala Affordable Housing R1.doc

2024 North King Street
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Project and Construction Management

October 21, 2013

Mr. Glenn Correa, Director
Parks and Recreation
County of Maui
700 Hali'a Nakoa Street, Unit 2
Wailuku, Hawai'i 96793

Dear Mr. Correa:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 16, 2013 and October 17, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *The fiscal year 2013-2014 park assessment fee rate for the Makawao-Pukalani-Kula Community Plan Area is $4,980.00 per unit. Since the 3-unit exemption for this property has been used, all 64 dwelling units will be subject to the park assessment fee. The total fee would be $318,720.00.*
>
> *Be advised that the aforementioned rate and fees are valid through June 30,2014, and are subject to change thereafter. Also, the applicant is required to satisfy the applicable park dedication requirements in effect at the time of final subdivision approval, or in this case, issuance of building permit.*

We appreciate your review of the subject project for applicability of park assessment requirements. We acknowledge your letter of October 17, 2013 stated that the subject project is exempt form the park dedication fee.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

ALAN M. ARAKAWA
Mayor

GLENN T. CORREA
Director

BRIANNE SAVAGE
Deputy Director

(808) 270-7230
FAX (808) 270-7934

DEPARTMENT OF PARKS & RECREATION
700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

September 16, 2013

Chester Koga, AICP
R. M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, HI 96819

Dear Mr. Koga:

SUBJECT: Draft Environmental Assessment for Proposed Kulamalu Affordable Housing, Makawao, Maui, Hawaii
TMK (2) 2-3-066:012, 013, 014

Thank you for the opportunity to review the subject Early Consultation Request.

The fiscal year 2013-2014 park assessment fee rate for the Makawao-Pukalani-Kula Community Plan Area is $4,980.00 per unit. Since the 3-unit exemption for this property has been used, all 64 dwelling units will be subject to the park assessment fee. The total fee would be $318,720.00.

Be advised that the aforementioned rate and fees are valid through June 30, 2014, and are subject to change thereafter. Also, the applicant is required to satisfy the applicable park dedication requirements in effect at the time of final subdivision approval, or in this case, issuance of building permit.

Should you have any questions or concerns, please feel free to contact me, or Steve Grogan, Capital Improvements Project Coordinator, at stephen.grogan@co.maui.hi.us or 808-270-6158.

Sincerely,

GLENN T. CORREA
Director of Parks & Recreation

c: Robert Halvorson, Chief of Planning & Development
GTC:RH:sg

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2024 North King Street
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R. M. TOWILL CORPORATION
SINCE 1930

Planning
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Environmental Services
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Project and Construction Management

October 21, 2013

Mr. Glenn Correa, Director
Parks and Recreation
County of Maui
700 Hali'a Nakoa Street, Unit 2
Wailuku, Hawai'i 96793

Dear Mr. Correa:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 16, 2013 and October 17, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *The fiscal year 2013-2014 park assessment fee rate for the Makawao-Pukalani-Kula Community Plan Area is $4,980.00 per unit. Since the 3-unit exemption for this property has been used, all 64 dwelling units will be subject to the park assessment fee. The total fee would be $318,720.00.*
>
> *Be advised that the aforementioned rate and fees are valid through June 30,2014, and are subject to change thereafter. Also, the applicant is required to satisfy the applicable park dedication requirements in effect at the time of final subdivision approval, or in this case, issuance of building permit.*

We appreciate your review of the subject project for applicability of park assessment requirements. We acknowledge your letter of October 17, 2013 stated that the subject project is exempt form the park dedication fee.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

ALAN M. ARAKAWA
Mayor

GLENN T. CORREA
Director

BRIANNE SAVAGE
Deputy Director

(808) 270-7230
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DEPARTMENT OF PARKS & RECREATION
700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

October 17, 2013

Chester Koga, AICP
R. M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, HI 96819

Dear Mr. Koga:

SUBJECT: Draft Environmental Assessment for Proposed Kulamalu Affordable Housing, Makawao, Maui, Hawaii TMK (2) 2-3-066:012, 013, 014

This letter is to revise our previous comments, provided in correspondence dated September 16, 2013, concerning the above subject action.

Upon review of additional information provided on behalf of the Department of Housing & Human Concerns, it is the determination of this Department that the above subject action is exempt from park dedication requirements, as the County of Maui is the owner of the subject parcels.

Should you have any questions or need of additional information, please feel free to contact me, or Steve Grogan, Capital Improvements Project Coordinator, at 808-270-6158 or stephen.grogan@co.maui.hi.us

Sincerely,

Brianne Savage
FOR GLENN T. CORREA
Director of Parks & Recreation

c: JoAnn Ridao, Director, Department of Housing & Human Concerns
Robert Halvorson, Chief of Planning & Development

GTC:RH:sg

S:\PLANNING\Steve G\No Objections\No Objections - Draft EA - Kulamala Affordable Housing R3.doc

Part II— Hawaiʻi Revised Statutes (HRS), 343 Draft Environmental Assessment

Draft Environmental Assessment per Hawai‘i Revised Statutes (HRS), Chapter 343

Kulamalu Affordable Housing

Pukalani, District of Makawao, Maui, Hawai‘i

Tax Map Key: (2) 2-3-066: 012, 013, and 014

January 2014

County of Maui
Department of Housing and Human Concerns
2200 Main Street
Wailuku, Hawai‘i 96793

Draft Environmental Assessment per Hawai‘i Revised Statutes (HRS), Chapter 343

Kulamalu Affordable Housing

Pukalani, District of Makawao, Maui, Hawai‘i

Tax Map Key: (2) 2-3-066: 012, 013, and 014

January 2014

County of Maui
Department of Housing and Human Concerns
2200 Main Street
Wailuku, Hawai‘i 96793

Prepared by:

Clifford Planning and Architecture LLC.
55 Merchant Street, Suite 3020
Honolulu, Hawai‘i 96813

and

R. M. Towill Corporation
2024 North King Street
Honolulu, Hawai‘i 96819
1-22197-0P

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ACRONYMS AND ABBREVIATIONS

ACOE	Army Corps of Engineers
BMPs	Best Management Practices
CCH	City and County of Honolulu
cdt	Census designated tracts
CDP	Community District Plan
CDUP	Conservation District Use Permit
CoK	County of Kaua‘i
CoM	County of Maui
CWA	Clean Water Act of 1972, as amended
CWB	Clean Water Branch, Department of Health, State of Hawai‘i
CZM	Coastal Zone Management
DLNR	State Department of Land and Natural Resources
DOCARE	Division of Conservation and Resource Enforcement, DLNR
DOFAW	Division of Forestry and Wildlife, DLNR
DWS	Department of Water Supply, County of Maui
EA	Environmental Assessment
ESA	Environmental Site Assessment
HAR	Hawai‘i Administrative Rules
HRS	Hawai‘i Revised Statutes
NEPA	National Environmental Policy Act
NOAA	National Oceanographic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
OHA	Office of Hawaiian Affairs
OHWM	Ordinary High Water Mark
SDOH	State Department of Health
PGA	Peak ground acceleration
SDOH-CWB	State Department of Health, Clean Water Branch
SDOT	State Department of Transportation
SHPD	State Historic Preservation Division, DLNR

ACRONYMS AND ABBREVIATIONS

SMA	Special Management Area
USCG	U.S. Coast Guard
USFWS	U.S. Fish & Wildlife Service
WWRF	Wastewater Reclamation Facility

Note: Spelling of Hawaiian place names follows Pukui et al. *Place Names of Hawai'i* [1974]

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1.0 Project Summary

Project:	Kulamalu Affordable Housing	
Applicant:	County of Maui, Department of Housing and Human Concerns	
Approving Agency:	County of Maui, Department of Housing and Human Concerns Ms. JoAnn Ridao, Director	
Consultant:	R. M. Towill Corporation 2024 N. King St. Suite 200 Honolulu, Hawai‘i 96819 Contact: Chester Koga email: chesterk@rmtowill.com phone: (808) 842-1133	
Tax Map Key(s):	(2) 2-3-066: 012, 013, and 014	
Proposed Action:	The proposed action involves the construction of an affordable multi-family housing project by the County of Maui consisting of a community center, seven two-story buildings with 64 housing units, 128 parking stalls, one loading zone, and two concrete driveways connecting the project with ‘Ōhi‘a Ku Street.	
Land Area:	4.179 acres	
Zoning:	Country Town Business (B-CT) District	
State Land Use District:	Urban	
Existing Land Use:	Vacant	
Special Management Area:	No	
Permits That May be Required:	County of Maui Subdivision Building Permit; Certificate of Occupancy Permit; Country Town Design Review; Drainage Approval; Driveway Permit; Electrical Permit; Fire Protection Permit; Grading and Grubbing Permit; Planned Development Approval; Plumbing Permit; Work on County Highway Permit.	State of Hawai‘i National Pollution Discharge Elimination System (NPDES) Permit.

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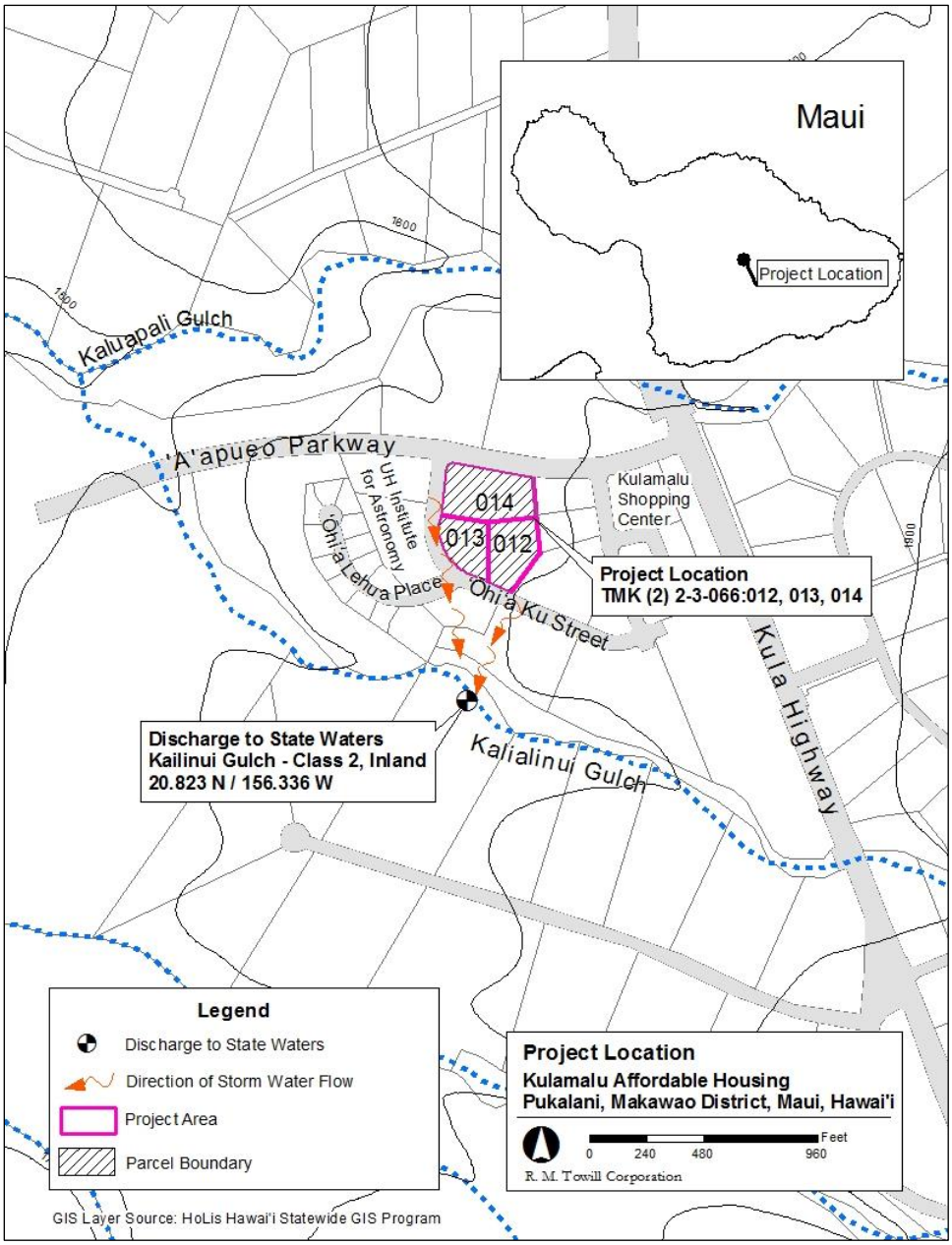
2.0 Introduction

2.1 Project Location and Area of Use

The Department of Housing and Human Concerns, County of Maui, proposes to construct the Kulamalu Affordable Housing Project, a 64-unit multi-family housing project on 4.179 acres on tax map keys (2) 2-3-066: 012, 013, 014. The project site is bounded by ʻŌhiʻa Ku Street and ʻAʻapueo Parkway, west of Kula Highway in Pukalani, Makawao District of Maui. See *Figure 2-1, Project Location*. The University of Hawaiʻi's Institute for Astronomy Maikalani Advanced Technology Research Center is located to the west of the project site, and to the east of the project site is the Kulamalu Shopping Center. Across from ʻA'apueo Parkway and to the northeast of the property is a single-family residential housing area.



2.2 Purpose of the HRS Chapter 343 Environmental Assessment

This Environmental Assessment (EA) is prepared in accordance with Chapter 343, Section 5, Hawaiʻi Revised Statues (HRS), which requires that an EA be prepared when state or county lands, or funds for development are used. Funding for the development of the Kulamalu Affordable Housing is partially derived from the U. S. Department of Housing and Urban and Development (HUD), and will be allocated through the County of Maui (CoM), Department of Housing and Human Concerns (DHHC). Accordingly, this allocation of funds by the County of Maui serves as the trigger for the preparation of this document. The majority of the funding for the proposed Kulamalu Affordable Housing project will come from the CoM's Affordable Housing Fund.

The applicant and accepting authority for this EA is the CoM, DHHC, which has preliminarily determined in accordance with Chapter 343, HRS, and Chapter 11-200, Hawaiʻi Administrative Rules (HAR), that the proposed project is not expected to result in adverse environmental effects. Based on the review and analysis of the proposed project, the environmental conditions associated with the project, and the mitigation measures proposed to address the potential for adverse effects, it is anticipated that a Finding of No Significant Impact (FONSI) will be issued.

2.3 Purpose and Need for the Proposed Project

The Kulamalu Affordable Housing project is being undertaken by CoM, DHHC in response to the growing demand for affordable multi-family housing on Maui. The population on Maui is expected to increase at a rate of 2.2 percent per year[1] outpacing the housing supply, which will result in approximately 10,845 units of unmet housing demand[2] by the year 2035.

The demand for affordable housing exists among households that pay more than 30 percent of their income on housing. According to HUD, "affordable housing should be priced below 30 percent of median area household income"[3]. Under this definition, when households spend 30 percent or more of their income on housing, excluding the cost of utilities, they are considered "cost burdened" and therefore potentially less able to purchase basic necessities such as food, clothing, transportation and

---

[1] Maui County General Plan. *Chapter 8: Directed Growth Plan*.
Retrieved from: http://www.co.maui.hi.us/ArchiveCenter/ViewFile/Item/17208

[2] 2009, July. State of Hawaiʻi, Department of Business, Economic Development and Tourism. *Population and Economic Projections for the State of Hawaii to 2035: DBEDT 2035 Series*.
Retrieved from: http://www.hawaiieconomicdata.com/DBFileDownload.ashx?file_id=687

[3] 2013, May 9. Housing and Urban Development. *Affordable Housing*.
Retrieved from: http://www.hud.gov/offices/cpd/affordablehousing/

medical care. The CoM, DHHC, Housing Division, also uses HUD's definition of affordable housing[4]. In 2011, 48.2 percent of CoM households devoted 30 percent or more of their income on housing. Within the Makawao-Pukalani-Kula District (otherwise referred to as Upcountry or the Upcountry region), the figures are more pronounced. According to HUD income guidelines, approximately 83.1 percent or approximately 7,606 households in the Makawao-Pukalani-Kula District paid 30 percent or more of their income on housing in 2011. Conversely, only 16.9 percent or approximately 1,547 households among Makawao-Pukalani-Kula District's total households (9,154) paid 30 percent or less of their income on housing in 2011[5]. For affordability indices for the County of Maui except for Hana, see *Table 2-1, Income Limits for Rental Units, County of Maui (2013).*

[4] 2013, February 1. County of Maui, Department of Housing and Human Concerns, Housing Division. *Income Limits & Affordable Rent Guidelines*. Pp.9. Retrieved from: http://hi-auicounty.civicplus.com/documents/13/43/2013%20Workforce%20Hsg%20-%20Affordable%20Sales%20Guidelines%20Based%20on%202011%20AS%20Data_20130131256273559.pdf

[5] 2011, November. Prepared for the County of Maui by the SMS Research & Marketing Services, Inc. *Hawaii Housing Planning Study, 2011.* Retrieved from: http://www.co.maui.hi.us/index.aspx?NID=1826

Table 2-1—Income Limits for Rental Units, County of Maui (2013)

	Percentage of Median Gross Monthly Income NOTE: $78,600 was the median household income for the County of Maui in 2010.									
	Affordable (housing costs <30% of gross-monthly income)			**Unaffordable** (housing costs >30% of gross-monthly income over 12 months)						
	10%	20%	30%	40%	50%	60%	70%	80%	90%	100%
No. of Persons										
1	$5,500	$11,000	$16,510	$22,010	$27,510	$33,010	$38,510	$44,020	$49,520	$55,020
2	$6,290	$12,850	$18,860	$25,150	$31,440	$37,730	$44,020	$50,300	$56,590	$62,880
3	$7,070	$14,150	$21,220	$28,300	$35,370	$42,440	$49,520	$56,590	$63,670	$70,740
4	$7,380	$15,270	$23,580	$31,440	$39,300	$47,160	$55,020	$62,880	$70,740	$78,600
5	$8,490	$16,980	$25,470	$33,960	$42,440	$50,930	$59,420	$67,910	$76,400	$84,890
6	$9,120	$18,240	$27,350	$36,470	$45,590	$54,710	$63,820	$72,940	$82,060	$91,180
7	$9,750	$19,490	$29,240	$38,990	$48,730	$58,480	$68,220	$77,970	$87,720	$97,460
8	$10,380	$20,750	$31,130	$41,500	$51,880	$62,250	$72,630	$83,000	$93,380	$103,750

Source: 2013, February 1. County of Maui, Department of Housing and Human Concerns, Housing Division. *Affordable Sales Price Guidelines.* Retrieved from: http://hi-mauicounty.civicplus.com/documents/13/43/2013%20Workforce%20Hsg%20-%20Affordable%20Sales%20Guidelines%20Based%20on%202011%20AS%20Data_201301311256273559.pdf

Assumptions about the maximum affordable sales price:

$78,600 Median family income for County of Maui as established by the U.S. Department of Housing and Urban Development (HUD)

2 Number of wage earning individuals living in households of 4 or greater persons

12 Gross monthly income estimates within this table are based on 12 months

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3.0 Project Description

3.1 Introduction

The CoM, DHHC, proposes to construct Kulamalu Affordable Housing, an affordable multi-family housing project on a 4.179-acre parcel. This project will consist of seven two-story buildings with 64 housing units, a community center, 128 parking stalls, one loading zone, and two concrete driveways connecting the project with ʻŌhiʻa Ku Street. Each multi-family housing unit will vary in size from 592 and 812 square feet (s.f.), the majority of which will feature private lanais. Available unit types will range from one bedroom/one bathroom to two bedrooms/one bathroom. The single story community center building will be comprised of a large multipurpose room with adjoining rooms where a laundry facility, office management, maintenance and security offices, and a kitchen will be located. Additional space is available at the community center for childcare services. The community center building will also feature two large covered lanais. See *Figure 3-1, Sheet A-1, Proposed Kulamalu Affordable Housing,* and *Figure 3-2, Sheet A-2, Proposed Kulamalu Community Center.*

3.2 Existing Land Uses

The proposed project is located in an area that is characterized by a mixture of rural and suburban areas. Adjacent parcels are currently in urban use. The project site and the adjacent properties are part of the 53.67 acre Kulamalu Town Center Subdivision (also known as the Kulamalu Commercial Subdivision).

The entire site has been previously subject to mass grading and is devoid of trees except for the few street trees growing in tree wells in the adjacent sidewalk. Ground cover is limited to non-native grasses and has been regularly maintained by CoM since it acquired the project site in 2011.

Figure 3-1—Proposed Kulamalu Affordable Housing

FLOOR AREA ANALYSIS:

TMK: 2-3-66 — LOTS 12, 13, 14 = 4.179 ACRES (182,037 SF)
ZONING: B-CT COUNTRY TOWN BUSINESS DISTRICT
FAR: 1

ALLOWABLE FLOOR AREA: 1 X 182,037 SF = 182,037 SF
PROPOSED FLOOR AREA:

COMM FACILITY	3,036 SF X 1 BLDG	=	3,036 SF
TOWNHOUSE I	9,416 SF X 2 BLDGS	=	18,832 SF
TOWNHOUSE II	5,996 SF X 1 BLDG	=	5,996 SF
TOWNHOUSE III	6,028 SF X 2 BLDGS	=	12,056 SF
TOWNHOUSE IV	6,410 SF X 2 BLDGS	=	12,820 SF
	TOTAL	=	52,740 SF

ALLOWABLE LOT COVERAGE: 25% X 182,037 SF = 45,509.25 SF
PROPOSED LOT COVERAGE:

COMM FACILITY	3,036 SF X 1 BLDG	=	3,036 SF
TOWNHOUSE I	4,974 SF X 2 BLDGS	=	9,948 SF
TOWNHOUSE II	3,148 SF X 1 BLDG	=	3,148 SF
TOWNHOUSE III	3,168 SF X 2 BLDGS	=	6,336 SF
TOWNHOUSE IV	3,352 SF X 2 BLDGS	=	6,704 SF
	TOTAL	=	29,172 SF (16.0%)

DENSITY: 18.0 UNITS / ACRE

	COMM FAC.	TOWNHOUSE I	TOWNHOUSE II	TOWNHOUSE III	TOWNHOUSE IV
BUILDING TYPE:	1-STORY	2-STORY	2-STORY	2-STORY	2-STORY
NO of BUILDINGS:	1	2	1	2	2
NO of UNITS/BUILDING:	N/A	12	8	8	8
TOTAL NO of UNITS:		24	8	16	16

FLOOR AREA SUMMARY:

BUILDING TYPE	UNIT NO.	UNIT TYPE	LIVING	LANAI	NO. of UNITS	NO. of BLDGS	TOTAL NO. of UNITS
TOWNHOUSE I 12-PLEX	A/AR	1 BED/1 BATH	634 SF	33 SF	4	2	8
	B/BR	2 BED/1 BATH	702 SF	32 SF	4	2	8
	C/CR	2 BED/1 BATH	812 SF	30 SF	2	2	4
	D/DR	2 BED/1 BATH	790 SF	30 SF	2	2	4
		COMMON AREA	514 SF				
TOWNHOUSE II 8-PLEX	E/ER	1 BED/1 BATH	592 SF	36 SF	4	1	4
	F/FR	2 BED/1 BATH	761 SF	35 SF	4	1	4
		COMMON AREA	300 SF				
TOWNHOUSE III 8-PLEX	E/ER	1 BED/1 BATH	595 SF	34 SF	4	2	8
	F/FR	2 BED/1 BATH	766 SF	35 SF	4	2	8
		COMMON AREA	292 SF				
TOWNHOUSE IV 8-PLEX	G/GR	2 BED/1 BATH	728 SF		4	2	8
	F/FR	2 BED/1 BATH	767 SF	34	4	2	8
		COMMON AREA	294 SF				

	GROUND FLOOR	SECOND FLOOR	TOTAL BLDG AREA	COMMON AREA + ELEC	NO. OF BLDGS	TOTAL GROSS AREA
TOWNHOUSE I	4,486 SF	4,442 SF	8,928 SF	488 SF	2	18,832 SF
TOWNHOUSE II	2,848 SF	2,848 SF	5,996 SF	300 SF	1	5,996 SF
TOWNHOUSE III	2,860 SF	2,860 SF	5,720 SF	308 SF	2	12,056 SF
TOWNHOUSE IV	3,058 SF	3,058 SF	6,116 SF	294 SF	2	12,820 SF
COMM FAC.	3,036 SF		3,036 SF		1	3,036 SF
TOTAL					8	52,740 SF

(UNIT COUNT: 2 BED/1 BATH = 44 UNITS 1 BED/1 BATH = 20 UNITS TOTAL UNITS = 64 UNITS)

PARKING TABULATION:

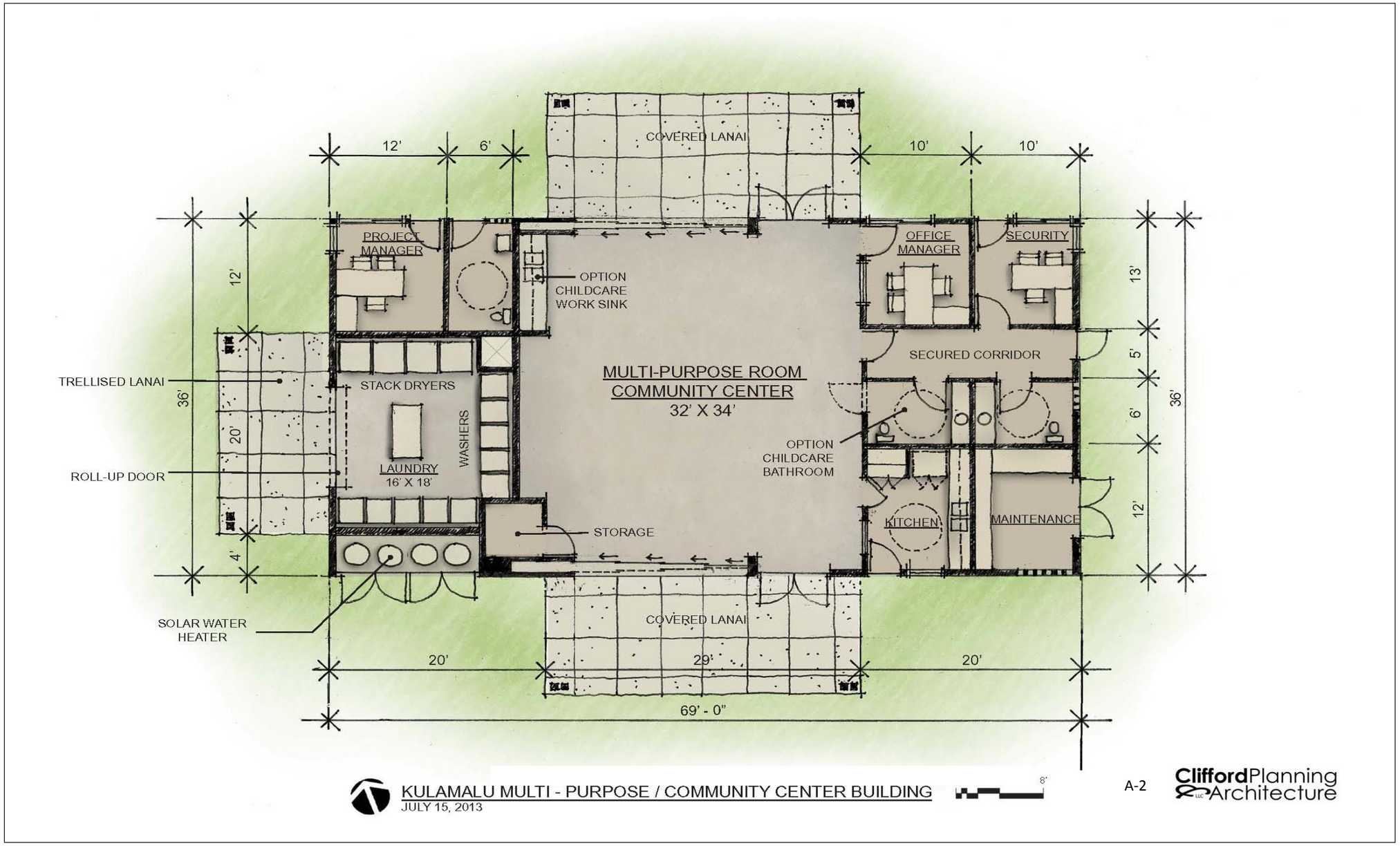
5 - 8 PLEX = 40 UNITS
2 - 12 PLEX = 24 UNITS
64 UNITS X 2 = 128 PARKING / 1 LOADING

COMM FAC. = 2 STALLS REQUIRED
5 STALLS PROVIDED
TOTAL PARKING: 133 PARKING / 1 LOADING

Kulamalu Affordable Housing
Presentation for Budget and Finance Commitee
Maui County Council
8.5.13 (Revised 6)
T.M.K. 2 - 3 - 66 : 12, 13, 14

A-1 Clifford Planning Architecture

Figure 3-2—Proposed Kulamalu Community Center



Photograph 3-1: View of the multi-family housing residential housing area to the project's northeast.
Photo Credit: Clifford Planning and Architecture LLC. June 20, 2013.

Photograph 3-2: Trees growing on the project site's adjacent sidewalks.
Photo Credit: Clifford Planning and Architecture LLC. June 20, 2013

Photograph 3-3: Non-native grasses on the project site.
Photo Credit: Clifford Planning and Architecture LLC. June 20, 2013

3.3 Planned Facilities

Seven two-story buildings will be developed on the project site. Each of the buildings will contain eight or twelve units each. Unit types range from one to two bedrooms with one bathroom. Two of the buildings will be approximately 8,700 s.f. and the remaining five buildings will be 6,116 s.f. The one bedroom units will have between 592 and 634 s.f. living area with a lanai that is between 33 and 36 s.f. The two bedroom units will have between 728 and 812 s.f. of living area and a lanai that is between 30 and 36 s.f. Parking facilities will be located within the center of the project. The building setback will be at least forty feet from the project site boundaries. Two concrete driveways will be constructed to provide street access to the proposed project.

The community center will be a 3,036 s.f. multi-purpose single story structure and will house common laundry facilities, a maintenance storage area, and a leasing agent/manager's office. Additional space is available within the community center for other uses such as day care. The project site will be landscaped and open areas will be interspersed near each of the buildings. Hedge landscaping and fencing will enclose the property from the surrounding streets. The proposed on-site landscaping will complement the landscaping within the Kulamalu Subdivision.

Planned utilities for the proposed project will involve the construction of sewer, and water laterals that will connect to existing six inch and eight-inch mains on ʻŌhiʻa Ku Street, and the intersection of ʻŌhiʻa Ku and ʻŌhiʻa Lehua Street. Electrical utilities will be also constructed and the Maui Electric Company (MECO) will provide electricity to the project. Separate electric metering will be provided for each unit. There are three existing ¾-inch water meters currently servicing the project site. The project may need to upsize meters to comply with the Department of Water Supply meter sizing requirements.

3.4 Cost

The estimated cost of constructing Kulamalu Affordable Housing is nine million dollars.

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4.0 Environmental Setting: Potential Impacts and Proposed Mitigation Measures

4.1 Climate and Rainfall

The proposed project site is located on the western slopes of Haleakalā in Upcountry Maui, a little more than 1 mile south of Pukalani town. In character with Upcountry Maui, Pukalani experiences annual average rainfall that ranges between 40 and 60 inches per year during the months of October to April. In addition, temperatures do not vary greatly, averaging in the 70s (degrees, Fahrenheit).

Potential Impacts and Proposed Mitigation

The proposed project is not expected to have any effect on the existing climate and therefore no mitigation is proposed.

4.2 Geology, Topography and Soils

Elevations at the site range from approximately 1,796 feet above mean sea level (msl) near ʻŌhiʻa Ku Street and the easternmost and southwestern portions of the site, to 1,746 above msl near the corner of ʻA'apueo Parkway and ʻŌhiʻa Ku Street The average difference in elevations between residential buildings is two feet.

Underlying the site and surrounding areas are soils belonging to the Waiakoa-Keahua-Molokaʻi association. These soils consist of moderately steep, well-drained soils that have moderately fine textured subsoil located on low uplands.

The specific soil type underlying the project site is Keahua cobbly silty clay (KnhC), has 7 to fifteen 15 percent slopes. This soil is characterized by slow to moderate runoff and slight to moderate erosion hazard.

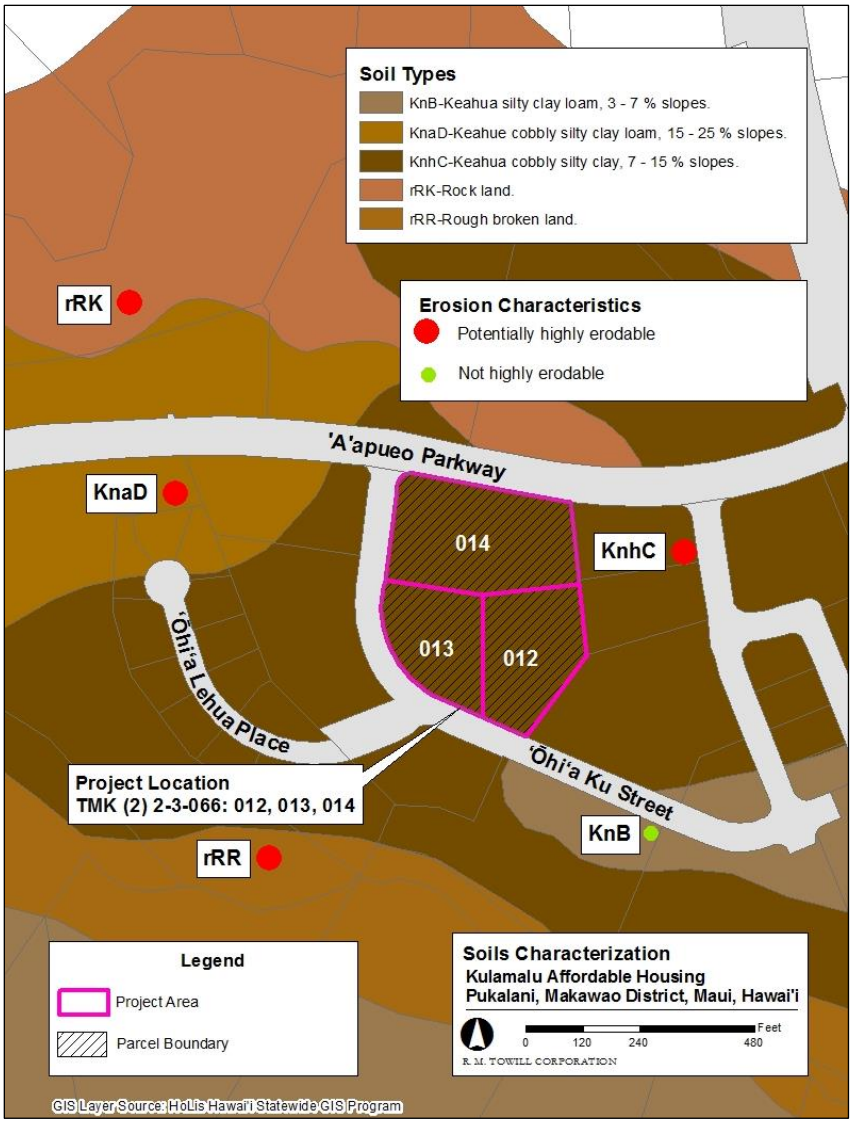
Keahua cobbly silty clay also underlies the nearby University of Hawaiʻi's Institute for Astronomy, the multi-family housing on the opposite side of ʻA'apueo Parkway, and the small shopping center, Kulamalu Town Center, on the eastern side of Kupaoa Street. See *Figure 4-1, Soils Characterization.*

The project site was previously cleared and mass graded in 1997. Grading of the project site will be limited to the uppermost slope of the project site which comprises of a small portion of the entire site. Construction plans, and project activities will be subject to review and approval by the CoM, Department of Planning. An Erosion Control Plan (ECP) will also be prepared as part of the construction plans for the project. Erosion controls will be implemented in accordance with the County of Maui Department of Public Works. Construction and Permanent Best Management Practices (BMPs) will also be utilized to control soil erosion and dust.

Potential Impacts and Proposed Mitigation

No further mitigation measures beyond the use of specified erosion control measures are anticipated to be required to address erosion.

Figure 4-1—Soils Characterization 1



4.3 Groundwater and Inland Surface Waters

The proposed project is not anticipated to affect any groundwater sources. There are no groundwater sources or surface water bodies at the project site. Kalialinui Gulch and Kaluapali Gulch, in the south and north respectively, are located nearest to the project site. Water servicing the project will be derived from Wailoa Ditch[6] (which has a storage capacity of approximately 82 million gallons[7]) and treated at

[6] County of Maui, Department of Water Supply. *Water Treatment Facilities*. Retrieved from: http://www.co.maui.hi.us/index.aspx?NID=775

4.3 Groundwater and Inland Surface Waters

The proposed project is not anticipated to affect any groundwater sources. There are no groundwater sources or surface water bodies at the project site. Kalialinui Gulch and Kaluapali Gulch, in the south and north respectively, are located nearest to the project site. Water servicing the project will be derived from Wailoa Ditch[7] (which has a storage capacity of approximately 82 million gallons[8]) and treated at the Kamole Water Treatment Plant[9]. Average daily production is 3.6 million gpd for the Kamole Water Treatment Plant[10].

Additionally, a BMPs Plan will be implemented during the construction phase as applicable in order to minimize potential impacts from erosion and runoff.

The only potential anticipated impact is from storm water runoff during periods of inclement weather. Mitigation from construction storm water runoff will be addressed through the filing of a National Pollutant Discharge Elimination System (NPDES), Construction Storm Water Permit. The NPDES permit will include a BMPs Plan for site grading and all major construction activities will be implemented during the construction phase as applicable in order to minimize potential impacts from erosion and runoff. The NPDES permit will also include a discussion of the types of permanent BMPs the contractor is recommended to put in to place to mitigate the gradual increase in storm water runoff after the project is constructed. The NPDES permit application will be prepared in accordance with Department of Health regulation governing the protection of state waters in the Hawai‘i Administrative Rules, Chapter 11-54, Water Quality Standards, and Chapter 11-55, Water Pollution Control. Construction of the project will not commence until a NPDES permit is obtained.

Potential Impacts and Proposed Mitigation

Groundwater and inland surface waters are not anticipated to be impacted other than in the form of potential storm water runoff. A NPDES permit will be obtained for the Kulamalu Affordable Housing project from the Department of Health and it will detail BMPs that the contractor will be recommended to implement to mitigate storm water runoff. No further mitigation is proposed or anticipated to be required.

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[7] County of Maui, Department of Water Supply. *Water Treatment Facilities*. Retrieved from: http://www.co.maui.hi.us/index.aspx?NID=775

[8] 2013, June 21. County of Maui, Department of Water Supply. *Upcountry Water Report*. Retrieved from: http://www.co.maui.hi.us/documents/22/378/3765/Jun15to21_201306211837466330.pdf

[9] County of Maui, Department of Water Supply. Olinda (Upper Kula) Water Treatment Facility. Retrieved from: http://www.co.maui.hi.us/index.aspx?nid=569

[10] 2013, June 21. County of Maui, Department of Water Supply. Kamole Weir. Retrieved from: http://www.co.maui.hi.us/index.aspx?NID=567

4.4 Natural Hazards

4.4.1 Floods

The property is located west of Kula Highway and is bound by ‘A’apueo Parkway in the north and ‘Ōhi‘a Ku Street in the southwest. Kalianui Gulch and Kaluapali Gulch are both located within approximately 500 feet of the project site. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Map Number 150003INDOB (revised September 25, 2009), the project site is located in an area designated as Flood Zone X (shaded). The Zone X designation denotes an area of minimal flooding and low flooding risk and is used to denote areas located outside the 100-year floodplain[11].See *Figure 4-2, FEMA Flood Plain Designations and Wetlands Areas*.

Potential Impacts and Proposed Mitigation

The proposed Kulamalu Affordable Housing project is not expected to be impacted based on its location within Zone X. No further mitigation measures are proposed or anticipated to be required.

4.4.2 Tsunami

According to the National Oceanic and Atmospheric Administration (NOAA), coastal inundation areas are the low-lying coastal lands, otherwise dry, that become flooded during extreme weather events, such as tsunamis. The proposed Kulamalu Affordable Housing is located at least one thousand feet above msl, which is well outside the coastal inundation area. See *Figure 4-3, Island of Maui Driving Advisory Areas*. For a detailed listing of tsunami evacuations maps, see the County of Maui website: http://www.co.maui.hi.us/index.aspx?nid=261.

Potential Impacts and Proposed Mitigation

No impact is anticipated and therefore no mitigation is proposed.

[11] Federal Emergency Management Agency (FEMA). *Definitions of FEMA Flood Zone Designations*. Retrieved from: https://msc.fema.gov/webapp/wcs/stores/servlet/info?storeId=10001&catalogId=10001&langId=-1&content=floodZones&title=FEMA%2520Flood%2520Zone%2520Designations

Figure 4-2—FEMA Flood Zone Designations and Wetland Areas

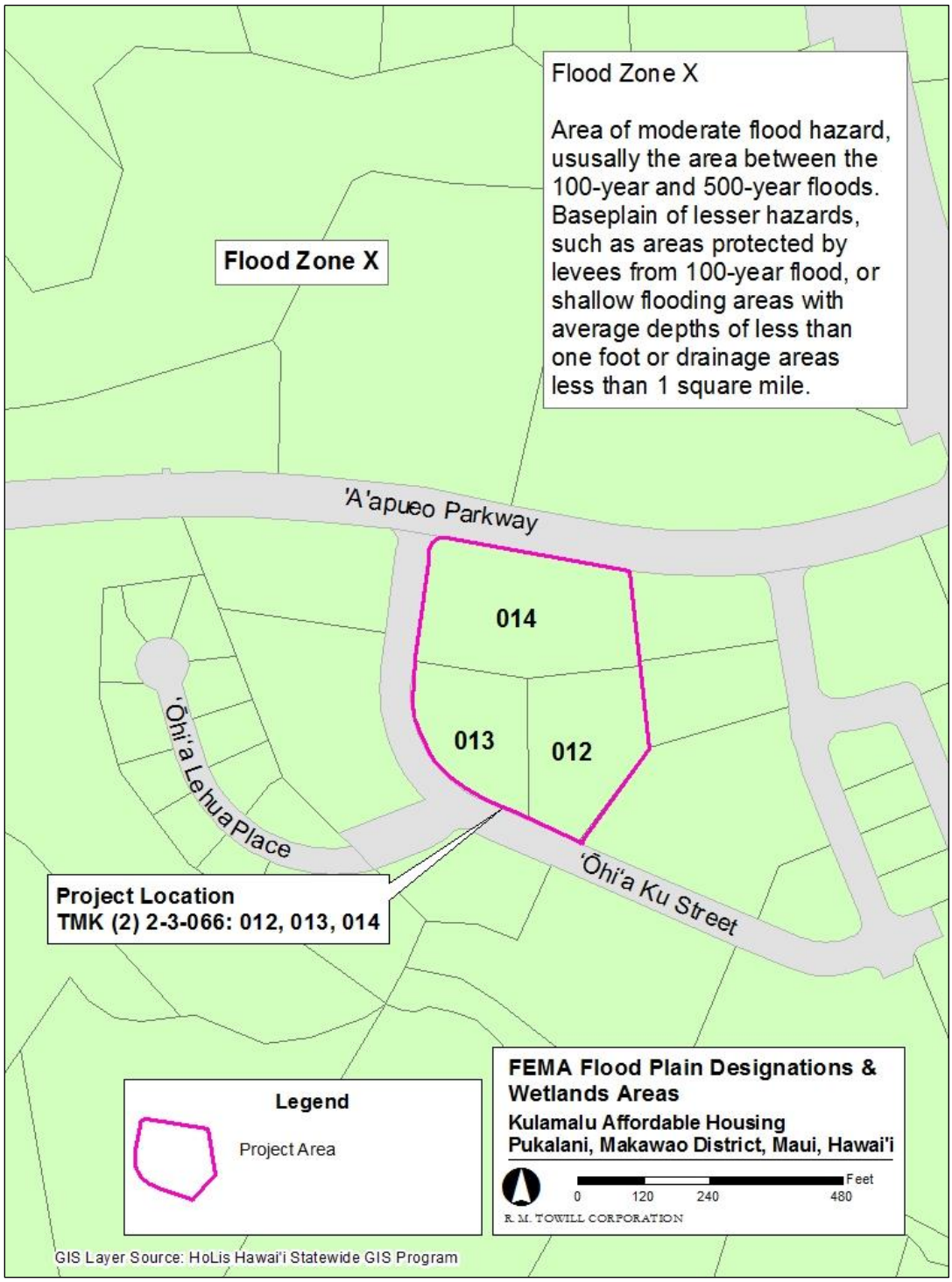
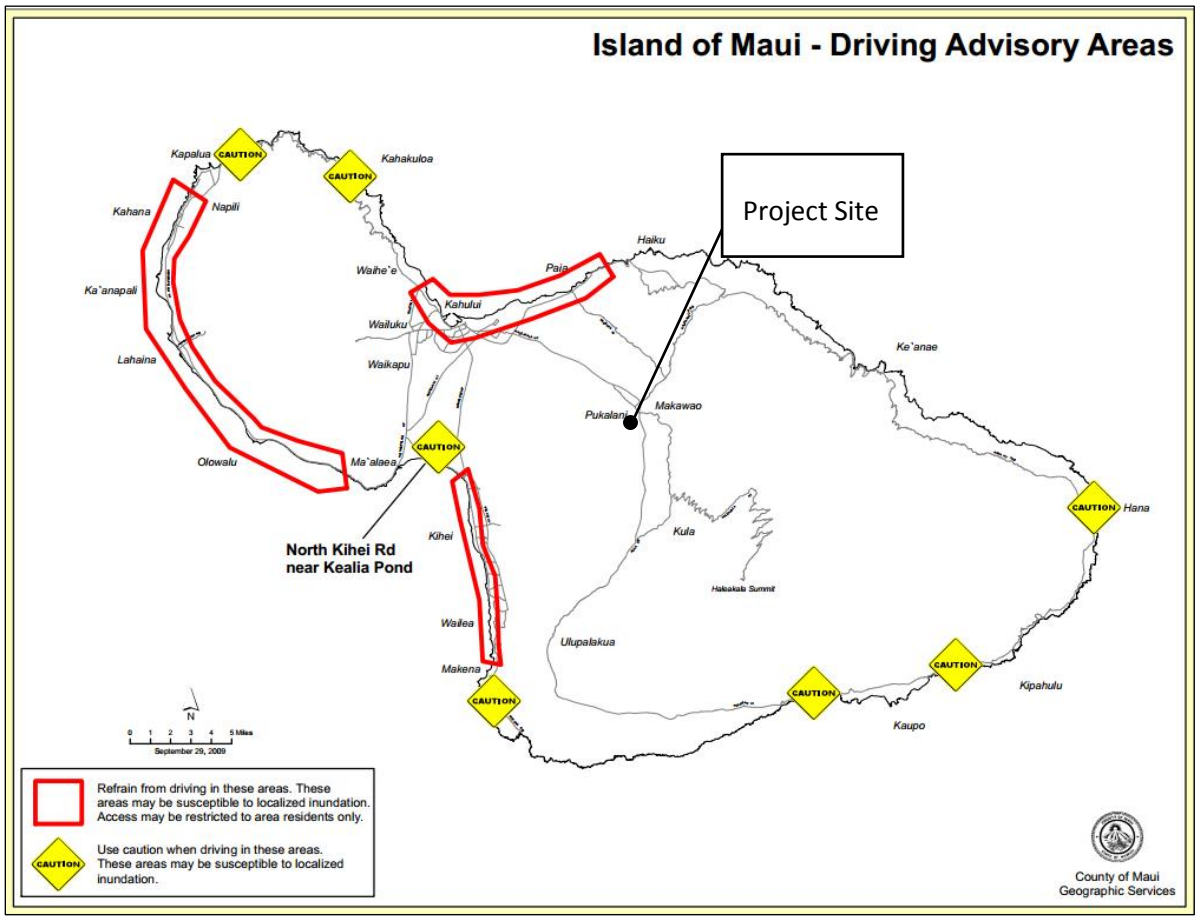


Figure 4-3—Island of Maui Driving Advisory Areas



Source: Maui County, Civil Defense Agency. *Map of Low-Lying Coastal Areas—Island of Maui*. Retrieved from: http://www.mauicounty.gov/documents/10/143/maui_advisories_tsunami.PDF

4.4.3 Seismic Activity

Seismic activity in the State of Hawai'i is largely attributable to volcanic activity[12] and is characterized by infrequent earthquakes. The greatest incidence of seismic activity occurs in Hawai'i County. According to the United States Geological Survey Hawaiian Volcano Observatory, the last reported earthquake near Maui occurred on June 24, 2013 off the coast of Moloka'i[13] and was a magnitude of 4.5 on the Richter Scale[14]. There were no injuries or damage reported as a result of the earthquake. The last large series earthquakes that seriously affected Maui occurred in 2006, were centered at Kiholo Bay on Hawai'i Island and registered a 6.7 on the Richter Scale[15].

Potential Impacts and Proposed Mitigation

Overall, the risk of earthquakes affecting Maui Island is minimal. *Figure 4-4, Hawai'i Seismic Hazards Map*, uses a peak ground acceleration (PGA) to denote the frequency with which earthquakes are likely to occur in Hawai'i. The majority of the island of Maui lies within the forty to sixty percentile range, which means that based on observed historic seismic activity, the probabilistic event of an earthquake occurring on Maui within the next fifty years exceeding or equal to a two percent chance is between forty and sixty percent. It is also unlikely that the island of Maui will experience an earthquake in the next fifty years[16]. Because Kulamalu Affordable Housing will adhere to the County of Maui Building Code, structures and paved surfaces will be earthquake resistant. No further mitigation is proposed or anticipated to be required.

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[12] United States Geological Survey. *Earthquake Hazards*. Retrieved from: http://pubs.usgs.gov/gip/hazards/earthquakes.html

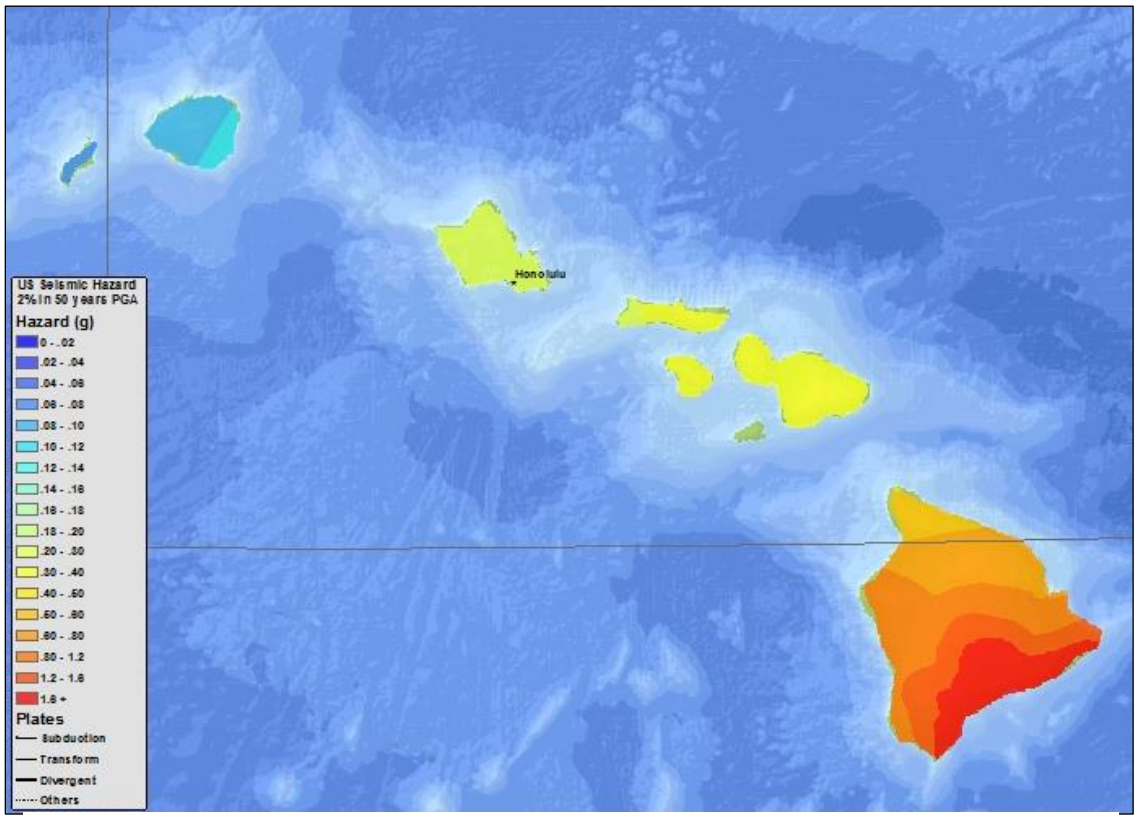
[13] United States Geological Survey, Hawaiian Volcano Observatory. *Recent Earthquakes in Hawaii*. Retrieved from: http://hvo.wr.usgs.gov/seismic/tux/Maps/Maui.html

[14] 2013, June 24. The Molokai News. *Earthquake magnitude 4.5 hits north shore after midnight Thursday*. Retrieved from: http://themolokainews.com/2013/06/24/earthquake-magnitude-4-5-hits-north-shore-after-midnight-thursday/

[15] United States Geological Survey, Earthquake Hazards Program. *Magnitude 6.7-Hawaii Region, Hawaii, 2006 October 15 17:07"48 UTC*. Retrieved from: http://earthquake.usgs.gov/earthquakes/eqinthenews/2006/ustwbh/

[16] United States Geological Survey, Hawaiian Volcano Observatory. *Recent Earthquakes in Hawaii*. Retrieved from: http://hvo.wr.usgs.gov/seismic/tux/Maps/Maui.html.

Figure 4-4—Hawai'i Seismic Hazards Map



Source: United States Geologic Survey, Earthquake Hazards Program

Retrieved from: http://earthquake.usgs.gov/earthquakes/states/hawaii/hazards.php

4.4.4 Hurricanes and High Winds

Hurricanes are tropical cyclones with "maximum sustained winds of 74 miles per hour or higher"[17]. The incidence of hurricanes in the State of Hawai'i is relatively rare. Within the past sixty years, major hurricanes (i.e. tropical cyclones with maximum sustained winds of 111 miles per hour or greater) that occurred were 'Iwa (1982) and Iniki (1992), both of which struck the island of Kaua'i with the greatest severity. Due to the proposed project's distant proximity to the shoreline, it remains unaffected by the potential for coastal inundation associated with hurricanes. The proposed project may however be vulnerable to the high winds associated with hurricanes. Based on data collected between 1949 and 1997 of observed high winds and extreme cyclone weather events, the project is most likely to be affected by tropical depressions (td), with maximum sustained winds of 38 miles per hour or less. The last recorded td event on Maui Island was in 1950, and was associated with Hurricane Hiki (1950).

[17] 2013. National Oceanic and Atmospheric Administration National Weather Service, National Hurricane Center. *Tropical Cyclone Climatology*. Retrieved from: http://www.nhc.noaa.gov/climo/

Among those with the greatest potential to be most financially affected by hurricanes, the CoM ranks third after the County of Kaua'i (CoK) and the City and County of Honolulu (CCH) in its annualized cost estimates associated with vulnerability to property loss[18]. If CoM were to experience an 'Iwa-strength storm, its estimated damages incurred would be between $1.2 and $2.2 billion. For an Iniki-strength storm, CoM would sustain damage estimated at $4.2 and 7 billion dollars[19]. As a mitigative measure, hurricane home insurance can be obtained by CoM[20] for the proposed Kulamalu Affordable Housing project. National Flood Insurance is obtainable separately; however the project location is situated in an area of minimal flooding risk (see *Section 4.4, A. Floods*).

Potential Impacts and Proposed Mitigation

Based on historical observations of the incidence of hurricanes and extreme winds on the island of Maui, the proposed project is not likely to be affected. Kulamalu Affordable Housing will be constructed in a manner that is consistent with current building safety codes in order to protect against hurricane and wind damage for winds less than 100 mph[21]. In order to mitigate natural hazards associated with extreme winds and hurricanes, the Kulamalu Affordable Housing will be built according to the County Building Code[22]. In the event that any tropical storm or hurricane activity should develop, the Central Pacific Hurricane Center issues watches/warnings/advisories usually within 36 hours of such a predicted weather event. This advance notice allows residents the opportunity to prepare and if necessary evacuate to the nearest emergency hurricane shelter in the King Kekaulike High School[23], located approximately half a mile away. Emergency evacuation procedures will be kept on the project site at all times which will also help prepare residents in the event of a hurricane. Other mitigative measures include hurricane insurance that can be obtained by CoM for the Kulamalu Affordable Housing. In place is an advanced hurricane and tropical storm tracking system as maintained by the Central Pacific Hurricane Center, and an emergency hurricane shelter is located nearby. The project is situated in an area of minimal flooding risk and well outside of the coastal inundation area. No further mitigation is proposed or anticipated to be required.

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[18] 2010. Hawai'i State Civil Defense. *The State of Hawai'i Multi Hazard Mitigation Plan*. Retrieved from: http://www.scd.hawaii.gov/documents/30_chapter5_rva_2010_regrevs09-28-2010_pub.pdf

[19] Hawai'i Coastal Hazard Mitigation Planning Project, Office of Planning, December 1993 as the original study with calculations updated by the University of Hawai'i, July, 2010.

[20] State of Hawai'i, Department of Commerce and Consumer Affairs, Insurance Division. A Consumer's Guide to Homeowner's Insurance in the State of Hawai'i. Retrieved from: http://hawaii.gov/dcca/home_rates/WEB_Jan_2013_Renters_Premiums.pdf

[21] 2009, October 13. State of Hawai'i. Chapter 180 Title 3, Hawaii Administrative Rules, State Building Code. Appendix W, Hawaii Wind design Provisions for New Construction. Retrieved from: http://www.scd.hawaii.gov/documents/35_Ch6_AppD_approved_state_building_code_2010.pdf

[22] New Maui County Code Chapter 16.08A. R301.2.11 Design Criteria. Retrieved from: http://www.co.maui.hi.us/documents/20/81/Ord3929_2006IRC_Mar20_1.PDF

[23] County of Maui, Civil Defense Agency. Emergency shelters/center for Maui County. Retrieved from: http://www.co.maui.hi.us/documents/10/Emergency%20Centers%20and%20Shelters.PDF

4.5 Air Quality

Air quality throughout the State of Hawaiʻi is attributed in part to the consistent trade winds that quickly disperse concentrations of emissions. The state maintains 14 air monitoring stations on three islands: Oʻahu, Hawaiʻi and Maui[24]. Using data collected from these monitoring stations in 2012, the State of Hawaiʻi was found in attainment of the National Ambient Air Quality Standards established under the Clean Air Act[25].

Potential Impacts and Proposed Mitigation

Any airborne particulates resulting from construction-related activities may temporarily affect the ambient air quality within the immediate vicinity of the project site. Mitigative measures will include the use of BMPs, such as site watering to minimize dust and constructing dust fencing along the project perimeter, to control airborne dust and to lessen fugitive dust from the project area. Combustion powered machinery and equipment will also be fitted out with mufflers as required by state and federal regulations. Any combustion powered machinery or equipment with engines and air emissions systems found to be in poor operating condition will be either repaired or replaced.

After construction, the project is not anticipated to generate adverse impacts to air quality. Exposed earth will be landscaped at the earliest opportunity to reduce soil erosion and minimize dust impacts.

4.6 Noise

The project site is located in an urban area comprised of residential and small-scale commercial lots. There are no significant fixed noise generators in the project's vicinity. The site itself is vacant and therefore does not generate noise. The predominant existing background noise source closest to the project site is attributable to vehicles traveling along the nearby Kula Highway and other existing roadways. The proposed project will also not involve the development of fixed noise generators.

Potential Impacts and Proposed Mitigation

Although construction of the proposed project will generate construction-related noise, it is expected to be short-term in duration. The proposed project will also not involve the development of sources of high noise volume normally associated with commercial or industrial activity. A consultation letter was sent to the Noise Section Supervisor of the Indoor and Radiological Health Branch at the State of Hawaiʻi Department of Health on August 13, 2013 to ascertain whether there are residences that could be impacted by excessive noise from the proposed project (See *Appendix A, Record of Consultations*). The response and proposed mitigative measures, if required, will be provided in the Final EA.

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[24] AirNow. *Air Quality Index, Hawaii*. Retrieved from: http://airnow.gov/index.cfm?action=airnow.local_state&stateid=12

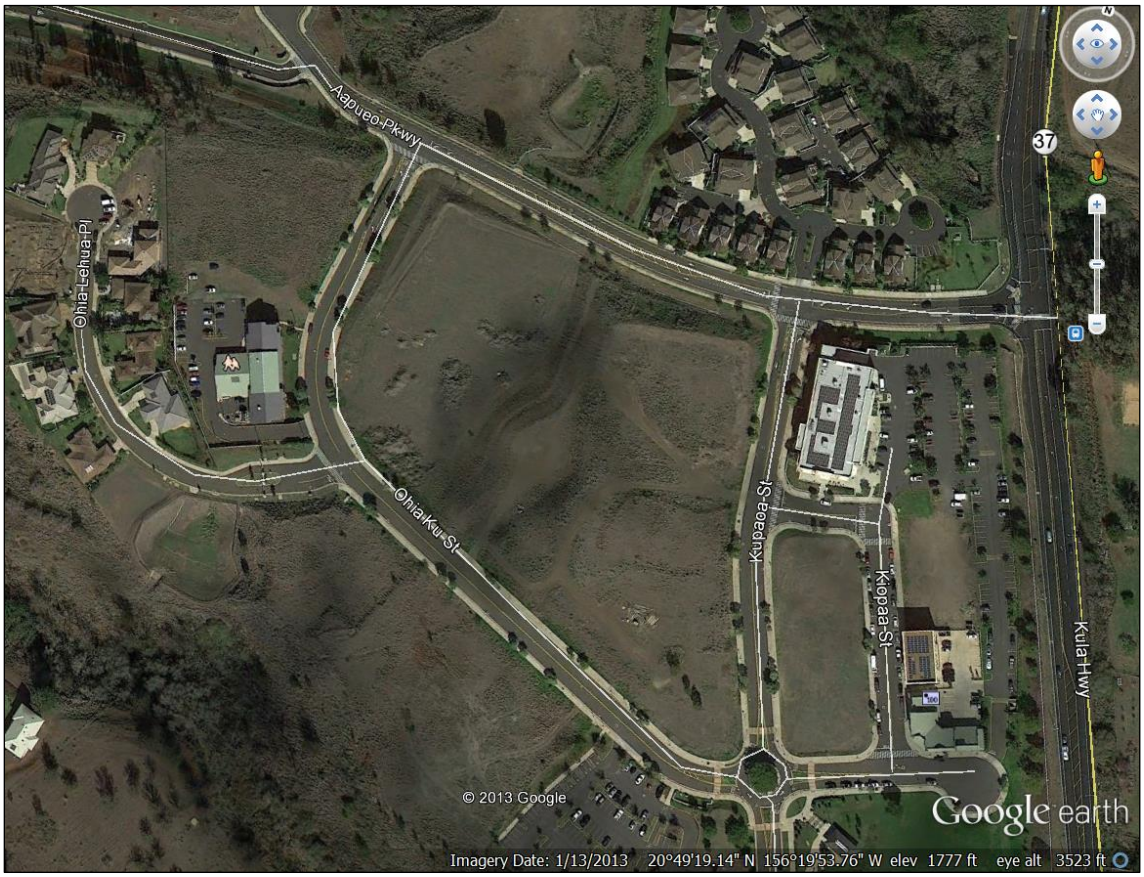
[25] State of Hawaiʻi, Department of Health. *Hawaiʻi Ambient Air Quality Data*. Retrieved from: http://emdweb.doh.hawaii.gov/air-quality/ and http://health.hawaii.gov/cab/files/2013/05/New_Years_Data_2013.pdf

4.7 Flora and Fauna Resources

The proposed project site and surrounding area have been subject to extensive mass grading as part of prior development activities in the late 1990s/early 2000s for the Kulamalu Development. Vegetation including grasses, shrubs, trees, and vertical terrain features that may have once provided habitat and/or forage for plant and animal species have been removed and the present condition of the site is of a relatively flat and graded surface with some pockets of rock or rubble piles. The cleared condition of the site there has been recruitment of some alien grasses such as fireweed (*Chamerion angustifolium*) and other weed species.

Since acquiring the property in 2011, CoM routinely maintains the proposed project site and has not discovered the presence of listed, endangered or threatened species. During the maintenance of the site, no listed, endangered or threatened species have been discovered. However, mitigation measures for potentially impacted, endangered or threatened species set forth by the U. S. Fish & Wildlife Service (USFWS) will be pursued where necessary. USFWS will be contacted if habitat, forage sites, or individual species of the Hawaiian Hoary Bat (*Lasiurus cinereus semotus*), Blackburn's Sphinx Moth (*Manduca blackburni*), and the Hawaiian Goose (*Branta sandvicensis*) are encountered at the proposed project site. The purpose for contacting the USFWS should these species be discovered is to ensure that appropriate mitigative measures can be applied to avoid the potential for adverse effects.

Figure 4-5—Google Earth Street View Image of Project Site



Potential Impacts and Proposed Mitigation

Non-native grasses are the only known ground cover on the project site. No terrestrial mammal species are known to be present at the proposed project site, with the possible exception of rats, mice, or feral cats from the surrounding area.

Although the project site is not expected to serve as habitat or foraging area for the species, Newell's shearwater (*Puffinus auricularis newelli*) and Hawaiian petrel (*Pterodroma sandwichensis*) may overfly the area and become affected or injured by outdoor artificial lighting and utility lines. CoM will recommend that the contractor utilize shielded lighting for outdoor fixtures. Protection against the potential for collisions with utility lines should also be considered and will be developed in consultation with the State of Hawaiʻi Department of Land and Natural Resources.

4.8 Scenic and Aesthetic Environment

The existing site has views of the surrounding area as well as the more distant slopes of Haleakalā and the West Maui Mountains. The proposed project is an infill urban development, and is not anticipated to significantly impact the scenic and aesthetic resources of the area. Multiple housing tracts exist to the northeast, southeast, and northwest of the project site. The Kulamalu Town Center is also located to the east of the project site.

Potential Impacts and Proposed Mitigation

The proposed project will change the proposed project site's scenic and aesthetic environment from its current vacant, undeveloped state, introducing eight new structures, irrigated landscaping, parking lots, and two concrete driveways connecting the proposed project to ʻŌhiʻa Ku Street. The proposed Kulamalu Affordable Housing project has been designed with a mass, scale and overall appearance to conform to the character of the Kulamalu Subdivision. The proposed project's buildings will be no more than two stories and 35 feet in height, take up an area of no more than 0.432 acres (18,832 square feet) each, and will have a setback distance of at least 40 feet from the project's boundaries. The site will also be landscaped. For these reasons, the proposed Kulamalu Affordable Housing project is a concentrated residential development that maximizes the use of landscaping to provide open space areas, does not obstruct the area's scenic and aesthetic environment, and strives to maintain the rural nature of Upcountry Maui. No further mitigation is proposed or anticipated to be required.

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5.0 Public Services: Potential Impacts and Mitigation Measures

5.1 Traffic and Circulation

The nearest major arterial road providing access to the proposed Kulamalu Affordable Housing project is Kula Highway (State Route 37). Kula Highway is located to the east of the proposed project site and has two lanes with a posted speed limit of 45 miles per hour (mph). The highway begins at the juncture of Haleakalā Highway and Haleakalā By-Pass Highway, connecting the Pukalani area with Kahului to the northwest. Kula Highway also connects with Piʻilani Highway (State Route 31), and Haleakalā Highway (State Route 377), providing eastern Maui with access to nearby regions. Two driveways will be built to connect the proposed project to a portion of ʻŌhiʻa Ku Street, a two-lane roadway with a posted speed of 30 miles per hour. These driveways will facilitate the movement of construction vehicles during the development phase and will remain permanent in order that residents of the Kulamalu Affordable Housing project can access local roads and outside communities. The proposed project site will not have a direct linkage to Kula Highway or any other major arterial roadways.

Potential Impacts and Proposed Mitigation

The Kulamalu Subdivision, in which the proposed Kulamalu Affordable Housing project is located, was master planned to include roadways that possess a maximum density to accommodate for future development within the Subdivision. The proposed Kulamalu Affordable Housing project will therefore not increase traffic densities because they are accounted for in the Kulamalu Subdivision roadway design.

During construction, vehicular traffic to and from the site will be limited to construction vehicles, the majority of which will not be moved off-site for the period of work. After construction, the proposed project's impact on the nearby traffic network is already accommodated for in the Kulamalu Subdivision roadway design, and therefore the potential for adverse effects are not anticipated.

Figure 5-1—Maui Island Highways Map State Routes 31, 37, and 377

5.2 Wastewater

Approximately 12,800 gpd[25] of wastewater is estimated to be generated by the proposed project upon the completion of construction and habitation of all residential units. Presently, wastewater is not generated from the undeveloped parcel.

Wastewater generated from the project will go to the project's sewer collection system that will connect to a Hawai'i Water Services facility and will be handled appropriately thereafter. The on-site sewer collection system will be constructed to provide the necessary infrastructure to support transmission of wastewater flows to the wastewater treatment facility.

Potential Impacts and Proposed Mitigation

The anticipated increase in wastewater generated by the proposed project will be handled by the Hawai'i Water Services through its existing wastewater treatment system. No adverse impacts are anticipated and therefore no further mitigation is proposed or projected.

5.3 Potable Water and Energy

Three existing ¾–inch water meters already service the project site. In accordance with Department of Water Supply meter sizing requirements, the meters may have to be upsized and/or consolidated to meet flow requirements of the project, but cannot exceed the cumulative assigned allocation of 20, 895 gpd. The project's estimated usage ranges between 15,000 to 18,000 gallons per day (gpd) on average with peak days at 18,000 to 20,000 gpd.

Recent water quantity and quality testing confirms adequate capacity and good quality of drinking water sources in the Makawao-Kula-Pukalani District. See *Table 5-1, County of Maui Department of Water Upcountry Water Report*, and *Table 5-2, 2012 Water Quality Monitoring Results for Makawao*.

Potential Impacts and Proposed Mitigation

The potential for adverse effects to the CoM's potable water supply is not anticipated as there is sufficient capacity of EPA compliant drinking water to support the project. Mitigative measures to reduce the overall water demand will be employed and could include, but are not limited to, the use of drought tolerate vegetation for landscaping and groundcover; the use of low-flow or low water use lavatory fixtures and appliances; and, a recommended schedule prohibiting the irrigation of area vegetation during certain the mid-day (e.g., between 12:00 p.m. to 4:00 p.m.) when evaporation and evapotranspiration loses are greatest.

[25] Estimate is based on the 6,000 gallon per month ceiling charge for multi-family housing dwellings. This amount is multiplied by the number of units (64) that will be constructed at Kulamalu Affordable Housing. Source: *County of Maui Department of Environmental Management Wastewater Services Information*.
Retrieved from: http://www.mauicounty.gov/index.aspx?NID=808

The use of energy to support the proposed project is not anticipated to result in adverse environmental effects. The minimal amount needed of fossil fuels will be utilized in the construction and development of the project. This use of fuel will be temporary and will last only for the duration of construction. No adverse effects are anticipated.

Table 5-1 — County of Maui Department of Water Upcountry Water Report

6/21/2013

DEPARTMENT OF WATER SUPPLY
COUNTY OF MAUI
UPCOUNTRY WATER REPORT

	AVAILABLE SUPPLY													DEMAND											
	WAILOA DITCH		WAIKAMOI #1		WAIKAMOI #2		KAHAKAPAO #1		KAHAKAPAO #2		PIIHOLO RESERVOIR			TREATMENT FACILITY (million gallons)							PUMPING Phase 10		PUMPING Phase 6	
DATE	MGD	%	MG	%	MG	%	MG	%	MG	%	MG	%	TOTAL	Kamole surface water	Kamole ground water	Kaupakalua	Haiku Well	Pookela	Piiholo	Olinda	KAMOLE TO LOWER LINE	KAMOLE TO PIIHOLO RESV.	LOWER LINE TO UPPER LINE	TOTAL
6/15/2013	82.0	41.1	0.0	0.0	0.0	0.0	38.1	76.2	37.9	75.8	47.7	95.4	**123.7**	0.1	0.0	0.5	0.3	0.0	5.4	2.1	0.0	0.0	0.0	**8.4**
6/16/2013	70.0	35.1	0.0	0.0	0.0	0.0	37.5	75.0	37.0	74.0	49.2	98.4	**123.7**	2.3	0.0	0.7	0.3	0.0	3.3	1.7	0.0	0.0	0.0	**8.3**
6/17/2013	65.6	32.8	0.0	0.0	0.0	0.0	36.6	73.2	36.4	72.8	49.4	98.8	**122.4**	2.2	0.0	0.7	0.3	0.0	2.2	1.7	0.0	0.0	0.0	**7.1**
6/18/2013	60.0	30.0	0.0	0.0	0.0	0.0	35.8	71.6	35.6	71.2	48.1	96.2	**119.5**	2.3	0.0	0.7	0.3	0.0	3.4	1.6	0.0	0.0	0.0	**8.3**
6/19/2013	57.2	28.6	0.0	0.0	0.0	0.0	34.6	69.2	34.6	69.2	48.4	96.8	**117.6**	2.3	0.0	0.6	0.3	0.0	2.3	1.8	0.0	0.0	0.0	**7.3**
6/20/2013	52.6	26.3	0.0	0.0	0.0	0.0	34.2	68.4	34.0	68.0	46.7	93.4	**114.9**	2.3	0.0	0.7	0.3	0.0	3.6	2.1	0.0	0.0	0.0	**9.0**
6/21/2013	59.3	29.7	0.0	0.0	0.0	0.0	34.2	68.4	34.0	68.0	46.7	93.4	**114.9**	2.3	0.0	0.6	0.3	0.0	3.1	1.6	0.0	0.0	0.0	**7.9**

The Upcountry area includes Haiku, Makawao, Olinda, Haliimaile, Pukalani, Omaopio/Pulehu, Kula, Keokea, Ulupalakua, and Kanaio.

03/15/13 - Director Taylor lifted the Drought Watch for Upcountry Maui.

NOTES
1. This report is to provide the reader with information on the Department's Upcountry Water Systems.
2. Available Surface Water Supply
   a. Wailoa Ditch maximum flow is 199.7 million gallons per day.
   b. Figures for the Waikamoi Reservoir includes two reservoirs. The total storage capacity (both reservoirs) is 30 million gallons.
   c. Figures for the Kahakapao Reservoir includes two reservoirs. The total storage capacity (both reservoirs) is 100 million gallons.
   d. Piiholo Reservoir has a storage capacity of 50 million gallons.
   e. The amount in the TOTAL column is obtained by adding the quantities for Waikamoi, Kahakapao, and Piiholo Reservoirs.
3. Surface Water Demand
   a. The numbers under the heading TREATMENT FACILITY represent the quantity of water sent out from the respective plants.
   b. The figure under the heading "Kamole to Piiholo Pumping" represents the quantity of water pumped from the Kamole Plant into the untreated water reservoir at Piiholo.
   c. The actual demand on the Kamole Plant is the amount shown less the "Kamole to Piiholo Pumping" amount.
   d. The TOTAL column is obtained by adding the demand quantities for the three plants less the amount pumped into the Piiholo Reservoir from Kamole WTF.
4. Total water used for the day is the sum of Surface Water Production plus Groundwater Production.
5. Rounding differences may result in this report.
6. Legend:
   a. MGD = Million Gallons per Day
   b. MG = Million Gallons
   c. % = Percentage of Total Capacity
7. The Upcountry Water System:
   a. Wailoa Ditch serves the Kamole Treatment Facility.
   b. Waikamoi and Kahakapao Reservoirs serve the Olinda Treatment Facility.
   c. Piiholo Reservoir serves the Piiholo Treatment Facility.
   d. Breakdown of service areas:
      i. Kamole Treatment Facility serves Haiku, Haliimaile, Pukalani, and parts of Makawao.
      ii. Piiholo Treatment Facility serves parts of Makawao, Lower Kula, Omaopio, and Pulehu.
      iii. Olinda Treatment Facility serves Olinda, Upper Kula, Keokea, Waiohuli, Ulupalakua, and Kanaio.
      iv. Kaupakalua Well serves parts of Haiku.
      v. Haiku Well serves parts of Haiku.
      vi. Po'okela Well supplements the Kamole Treatment Facility (parts of Haiku, Haliimaile, Pukalani, Makawao).

Table 5-2 — 2012 Water Quality Monitoring Results for Makawao

2012 WATER QUALITY MONITORING RESULTS FOR THE: MAKAWAO SYSTEM

This water has been tested and meets all Federal and State Standards. Testing was conducted and compiled in 2012 for reporting by July 2013. The following data is about **your** drinking water. Data listed are from the most recent testing and monitoring done in accordance with the regulations of the State of Hawaii Department of Health.

This water serves: Haiku, Haliimaile, Makawao, and Pukalani

SOURCE NAME	ORIGIN	TREATMENT	SOURCE NAME	ORIGIN	TREATMENT
Wailoa Ditch	Surface	Microfiltration/Chlorination	Kaupakalua Well	Ground	Chlorination
Haiku Well	Ground	Chlorination	Pookela Well	Ground	Chlorination

If a contaminant is NOT SHOWN, IT WAS NOT DETECTED

Regulated Contaminants[1]	Unit of Measure	Highest Detected Level[2]	Range[3]	EPA's Allowable Limits MCL[4]	EPA's Allowable Limits MCLG[5]	Typical Source of Contamination[6]	Is Your Water Safe? Compliance Met?
Chromium (Total)	ppb	1.1	ND-1.1	100	100	Erosion of natural deposits	✓ Yes
Copper	ppm	0.002	ND-0.002	1.3[8]	1.3[8]	Erosion of natural deposits; corrosion of plumbing fixtures	✓ Yes
DBCP (1,2-Dibromo-3-chloropropane)	ppt	19	ND-19	200	0	Erosion of man-made chemicals	✓ Yes
Fluoride	ppm	0.14	ND – 0.14	4	4	Erosion of natural deposits	✓ Yes
Hexachloropentadiene	ppb	0.064	NA	50	50	Erosion of man-made chemicals	✓ Yes
Nitrate (as N)	ppm	1.93	ND – 1.93	10.0	10.0	Erosion of natural deposits;runoff from fertilizer use; leaching from septic systems	✓ Yes
TCP (1,2,3 trichloropropane)	ppt	260	ND-260	600*	N/A	Runoff/leaching from soil fumigant	✓ Yes
Radiologicals,Beta particles (Sample year-2011)	pCi/L	4.1[9]	ND–4.1	50[7]	0	Decay of natural & man-made deposits	✓ Yes
Xylenes	ppm	.0024	ND-.0024	10	10	Erosion of man-made chemicals	✓ Yes
Distribution System Monitoring (Disinfection By-Products)	**Unit of Measure**	**Highest Annual Average[2]**	**Range[3]**	**EPA's Allowable Limits MCL[4]**	**EPA's Allowable Limits MCLG[5]**	**Typical Source of Contamination[6]**	**Is Your Water Safe? Compliance Met?**
TTHM's (Total Trihalomethanes)	ppb	30	3-39	80	N/A	Disinfection by-product	✓ Yes
HAA's (Haloacetic Acids)	ppb	10	0-13	60	N/A	Disinfection by-product	✓ Yes

[1] Detected contaminant
[2] Highest detected level or highest average level found
[3] Range of levels found
[4] Highest Level allowed by EPA
[5] EPA's goal
[6] Possible source of contaminant
[7] EPA considers 50 pCi/L to be the level of concern for beta particles
[8] Action level
* Regulated in Hawaii but not by EPA

[9] The state allows us to monitor for some contaminants less than once per year because the concentrations of these contaminants do not change frequently. Some of our data, though representative, are more than one year old.

Unregulated Contaminants	Unit Of Measure	Sample Year	Range[3] Detected	Use or Environmental Source	
Chlorate	ppb	2012	ND - 170	Disinfection byproduct; agricultural defoliant or desiccant	*EPA uses the Unregulated Contaminant Monitoring Rule (UCMR) to collect data for contaminants suspected to be present in drinking water but do not have health-based standards set under the Safe Drinking Water Act. The purpose of monitoring for these contaminants is to help EPA decide whether the contaminants should be regulated.*
Hexavalent Chromium	ppb	2012	ND – 1.2	Naturally occurring element; used for chrome plating, dyes and pigments, and wood preservation	
Strontium	ppb	2012	ND – 110	Naturally occurring element; historically used in the faceplate glass of cathode-ray tube televisions	
Vanadium	ppb	2012	ND - 13	Naturally occurring elemental metal; used as vanadium pentoxide which is a chemical intermediate and a catalyst	
1,2,4 Trimethylbenzene	ppb	2012	ND – 0.74	Leaching of tank repair materials	
Di-n-butylphthalate	ppb	2012	ND – 1.3	Leaching of tank repair materials	

LEAD/COPPER Rule Compliance Monitoring

Contaminant	Sample Date	Unit of Measure	90th Percentile Reading	Action Level	# of Samples Above Action Level	Is Your Water Safe? Compliance Met?
Lead	2010	ppb	< 5	15	1	✓ Yes
Copper	2010	ppm	0.02	1.3	0	✓ Yes

The next round of testing for the Makawao System is 2013.

Infants and young children are typically more vulnerable to Lead in drinking water than the general population. It is possible that Lead levels at your home may be higher than at homes in the community as a result of material used in your home's plumbing. If you are concerned about elevated Lead levels in your home's water, you may wish to have your water tested. **As a general practice, you should flush your tap for 30 seconds to 2 minutes before using the tap water, if you have not used it for 4-6 hours.** Additional information is available from the Safe Drinking water Hotline at 1-800-426-4791

State Water System ID#: 213 Date Distributed: June 2013

5.4 Solid Waste

On a short-term basis, construction activities will require the disposal of construction-related solid waste at the Central Maui landfill. The CoM, DHHC will work with the contractor to minimize the amount of solid waste generated during the construction of the project. As appropriate, Maui Demolition & Construction (C&D) Landfill, privately owned and operated by Decoite, Inc.[27], will be utilized by the contractor for the disposal of construction waste materials.

In the long-term, solid waste collection for the project will be provided by a commercial waste disposal service.

Potential Impacts and Proposed Mitigation

According to the County of Maui Integrated Solid Waste Management Plan[28], capacity at the Central Maui Landfill is expected to run out in 2026. The proposed project is expected to be constructed and occupied within three years of its approval, which is well before additional solid waste capacity will be required for the Central Maui Landfill. Determination has been received by the County of Maui, Department of Environmental Management (DEM) for confirmation (see *Appendix A, Record of* Consultations). A construction waste management plan will be developed in coordination with the DEM, Solid Waste Division prior to the commencement of construction activities.

Upon the project's completion, solid waste collection and disposal for all 64 units will be provided by a private waste collection company. The proposed project is expected to be constructed and occupied well before additional capacity will be required for the Central Maui Landfill. Furthermore, the proposed project is not anticipated to significantly impact the long-term capacity of the County's Central Maui Landfill. No further mitigation is proposed or anticipated for the project.

5.5 Power and Communications

The Maui Electric Company (MECO) runs a transmission circuit along ʻŌhiʻa Ku Street and will provide electricity to the project site to accommodate all residential units for the proposed Kulamalu Affordable Housing project.

Potential Impacts and Proposed Mitigation

Upon project completion, electrical service will be provided to the Kulamalu Affordable Housing multi-family units by MECO. The proposed project will be constructed in accordance with the 2006

[27] 2009, February 17. Prepared for County of Maui, Department of Environmental Management Solid Waste Division by Gershman, Brickner & Bratton, Inc. *Integrated Solid Waste Management Overview*. Retrieved from: http://www.co.maui.hi.us/documents/11/29/93/Overview%20of%20final%20ISWMP.PDF

[28] 2009. County of Maui Solid Waste Management Program. Retrieved from: http://www.co.maui.hi.us/index.aspx ?nid=881

International Energy Conservation Code[29], and the design of the units will utilize high energy efficiency measures, such as but not limited to the installation of Energy Star certified appliances, low-flow water fixtures and compact fluorescent (CF) lamps. This provision of energy for the proposed residential use of the project site is not anticipated to result in adverse environmental effects.

Lighting, if required for the illumination of streets, will be shielded to reduce the potential for effects to overflights of threatened or endangered seabirds such as Newell's shearwater (*Puffinus auricularis newelli*), Hawaiian petrel (*Pterodroma sandwichensis*), or other affected species.

5.6 Police Protection

Police protection for the Makawao-Pukalani-Kula Community Plan Region (CPR) is provided the Maui Police District (MPD) District I—Wailuku (Central) Patrol Division which is also serves as the County Police Department headquarters. It is located approximately twelve miles away from the proposed project[30]. Additional police protection is provided by the Police substation located approximately two miles away at the Eddie Tam Park Community Center[31].

Potential Impacts and Proposed Mitigation

The proposed Kulamalu Affordable Housing project is an infill project adjacent to existing residential areas in the Pukalani community and does not require an extension of the existing police service area. No further mitigation measures are proposed or anticipated to be required.

5.7 Fire Protection

Fire prevention, suppression, and protection services for the project area are provided by the County Department of Fire and Public Safety's Makawao Fire Station which is located approximately one mile north of the project site near Haleakalā Highway in Pukalani.

Potential Impacts and Proposed Mitigation

Fire protection service requirements are not anticipated to be adversely affected by the proposed project. The proposed Kulamalu Affordable Housing project is an infill development and will not extend service area limits for fire protection services.

A letter of consultation was sent to the County of Maui Fire Chief on August 13, 2013. A response was received from the Lieutenant of the Fire Prevention Bureau on August 30, 2013. The letter stated that mitigation methods should include compliance with the new County of Maui Fire code which takes

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[29] 2006. International Code Council, Inc. *2006 International Energy Conservation Code*. As Incorporated into the County of Maui Ordinance No. 3685, Bill No. 73 (2009).
Retrieved from: http://www.co.maui.hi.us/documents/20/81/Ord%203685_EnergyCode_Eff_Dec20-09.PDF

[30] 2007. County of Maui and R.M. Towill Corporation. *Public Facilities Assessment for the County of Maui*.

[31] Eddie Tam Park http://www.co.maui.hi.us/facilities/Facility/Details/163

effect June, 2014. Further mitigation measures to be considered for Kulamalu Affordable Housing includes fire sprinklers for fire protection. See *Appendix A, Record of Consultations.*

5.8 Health Care and Emergency Services

Maui Memorial Medical Center (MMC) is one of three licensed hospitals on the island of Maui, and is the only acute care facility. MMC is located approximately thirteen miles away from the project site. It possesses Maui's largest portion of acute care hospital beds and offers the largest array of patient services in the County of Maui.

Kula Hospital, another licensed hospital on Maui, is the hospital closest to the project site. It is characterized by a small number of acute care beds, approximately 200 inpatient skilled nursing and intermediate care beds, and is the only long-term care facility for the developmentally disabled.

There are only two private, for-profit long-term nursing care facilities for the elderly and are operated by the same licensed hospital, Hale Makua in Wailuku and Kahului. Both of these elderly nursing care facilities are located approximately thirteen and ten miles respectively from the project site.

There are three specialty care substance abuse treatment facilities, Maui Farm, Hoʻomaka House, and Aloha House, located in Paʻia, which is about nine miles away from the project site[32].

As of 2007, Emergency Medical Services (EMS) in the Makawao-Pukalani-Kula CPR consisted of an ambulance facility in Kula, which has one 12-hour a day staffed primary vehicle[33].

Potential Impacts and Proposed Mitigation

The proposed project is not anticipated to adversely affect access to and the provision of health care and emergency medical services. As an urban infill project, the development will not extend service area limits for health care and emergency medical services. No further mitigation measures are proposed or anticipated to be required.

5.9 Parks and Recreation

Open space resources are planned within the project site. Landscaping on the project site will provide visual relief in addition to recreational open air space for residents. See *Figure 2-1, Sheet A-1, Proposed Kulamalu Affordable Housing*. Nearby existing open space and park resources include the Mayor Hannibal Tavares Community Center and Upcountry Pool, the Harold Rice Park, and the Eddie Tam Park, all of which are County-owned and operated facilities located within two miles, and seven miles respectively of the project site. The Mayor Hannibal Tavares Community Center and Upcountry Pool comprise twenty acres and offers an aquatic center, baseball/softball fields, basketball courts, a

[32] 2011. County of Maui Office of Economic Development, and Hawaii Small Business Development Center. Maui County Data Book. Hawaiʻi Business Research Library.

[33] 2007. County of Maui and R.M. Towill Corporation. *Public Facilities Assessment for the County of Maui*.

community center, locker rooms, parking, restrooms, a soccer field, telephones, tennis courts and water. The Harold Rice Park is 3.8 acres and offers parking, picnic tables, restrooms, telephones and potable water for drinking fountains and restroom facilities. The Eddie Tam Park has a gymnasium, Community Center with a multipurpose meeting room, a Department of Health Office, and a Police substation. It also has a number of baseball/softball fields, tennis courts, a basketball court, two soccer fields, a playground, picnic areas and public restrooms[34].

Potential Impacts and Proposed Mitigation

The proposed Kulamalu Affordable Housing project will not affect the area's open space and recreational resources. The proposed project is not anticipated to place any significant new demands on recreational activities particularly because the project site will feature several open space areas. The County of Maui, Department of Parks has deemed the proposed project is exempt from park assessment fees because the subject property is owned by the County of Maui. See *Appendix A, Record of Consultations.* For these reasons, no mitigation measures are proposed or are anticipated to be required.

[34] County of Maui, Department of Parks and Recreation. Mayor Hannibal Tavares Community Center & Upcountry Pool. Retrieved from: http://www.mauicounty.gov/facilities/Facility/Details/124
Harold Rice Park. Retrieved from: http://www.co.maui.hi.us/facilities/Facility/Details/168
Eddie Tam Park. Retrieved from: http://www.co.maui.hi.us/facilities/Facility/Details/163

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6.0 Socioeconomic and Related Environment: Potential Impacts and Mitigation Measures

6.1 Socioeconomic Characteristics

As of 2010, the total population for the County of Maui (CoM) was 154,834, the majority of which resided on the island of Maui (2010 U.S. Census). The total population of Upcountry Maui was 19,934 in 2010, making it the fourth most populated area on the island. Estimates for the Upcountry region are comprised of census designated tracts (cdt) for Kula (cdt 303.01[35]), Pukalani (cdt 304.02[36]), and Makawao (cdt 304.03[37])[38]. Among these three census designated tracks, Pukalani had the largest population (7,574), which was seven percent larger than Makawao and fifteen percent larger than Kula. Population demographics were similar in all three cdt's as racial distribution was predominantly comprised of Caucasian, two or more races, and Asian[39]. In addition, these three cdts were overwhelmingly characterized by a population between the ages of 18 and 64, which is the range encompassing the entry level legal working age and the traditional retirement age. Among Upcountry Maui's working population only about seven percent have their primary place of work in the community[40]. This means that a large portion of Upcountry Maui's working population commutes outside of the community for work, spending a larger share of their income on transportation costs than residents of the more concentrated urban areas of the island such as Kahului.

The projected population growth for the County of Maui is 2.2 percent per year[41] and is based on growth rates observed during the past ten years. This population growth is anticipated to outpace housing units' construction, and DBEDT projects that by the year 2030 there will be an unmet demand of 10,845 housing units.

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[35] 2013, June 27. U.S. Census Bureau. Kula CDP QuickFacts. Retrieved from: http://quickfacts.census.gov/qfd/states/15/1541600.html

[36] 2013, June 27. U.S. Census Bureau. Pukalani CDP QuickFacts. Retrieved from: http://quickfacts.census.gov/cgi-bin/qfd/extract?1565900

[37] 2013, June 27. U.S. Census Bureau. Makawao CDP QuickFacts. Retrieved from: http://quickfacts.census.gov/qfd/states/15/1548050.html

[38] 2011. County of Maui Office of Economic Development, and Hawaii Small Business Development Center. Maui County Data Book. Hawai'i Business Research Library.

[39] Ibid. 2012. U.S. Census. PEPSR6H-Sex-Both Sexes Year-April 1, 2010 Census Hispanic Origin-Total: Annual Estimates of the Resident Population by Sex, Race, and Hispanic Origin for the United States, States, and Counties: April 1, 2010 to July 1, 2012. Retrieved from: https://www.google.com/search?q=PEPSR6H-Sex-Both+SexesYearApril+1%2C+2010+CensusHispanic+Origin-Total%3A+Annual+Estimates+of+the+Resident+Population+by+Sex%2C+Race%2C+and+Hispanic+Origin+for+the+United+States%2C+States%2C+and+Counties%3A+April+1%2C+2010+to+July+1%2C+2012&rlz=1C1ARAB_enUS523US523&oq=PEPSR6H-Sex-Both+SexesYear-April+1%2C+2010+CensusHispanic+Origin-Total%3A+Annual+Estimates+of+the+Resident+Population+by+Sex%2C+Race%2C+and+Hispanic+Origin+for+the+United+States%2C+States%2C+and+Counties%3A+April+1%2C+2010+to+July+1%2C+2012&aqs=chrome.0.69i57.878j0&sourceid=chrome&ie=UTF-8

[40] 2011. County of Maui Office of Economic Development, and Hawai'i Small Business Development Center. Maui County Data Book. Hawai'i Business Research Library.

[41] 2012, December 28. Maui Island Plan: General Plan 2030. Retrieved from: http://www.co.maui.hi.us/index.aspx?nid=1503

The demand for multi-family affordable housing is particularly pronounced in Upcountry Maui, a "bedroom community," where a significant portion of families reside and commute great distances (i.e. 13 to 20 miles respectively) to the urban centers of Kahului and Kihei where more jobs are located. Median average income for the entire County of Maui was $78,600 in 2010. The average price of a single family home and condominium is about half a million dollars for Kula, Pukalani and Makawao towns. At the low end, the average price was $475,113 in Pukalani, $546,648 in Makawao, and at the high end $740,443 in Kula[42].

Potential Impacts and Proposed Mitigation

Given the size and scope of the proposed action, the potential for adverse effects to Upcountry Maui's population are not expected. The project is anticipated to accommodate some of the local demand for affordable housing among current Upcountry residents. Any increase or change in population in the Makawao-Pukalani-Kula district should be within expected growth parameters of the Maui General Plan 2030 of 2.2 percent per year. No further mitigation is proposed or anticipated to be required.

6.2 Land Use and Ownership

The project site is bordered to the north by 'A'apueo Parkway and to the northwest there is a private residential housing development. To the west is 'Ōhi'a Ku Street and beyond is the University of Hawai'i's Institute for Astronomy Maikalani Advanced Technology Research Center. To the east, the land appears vacant and covered with non-native grasses similar to the project site. See *Figure 6-1, Google Earth Street View Image of the Project Site*. To the east of Kupaoa Street is the Kulamalu Town Center. See *Photograph 6-1, View of Longs from the Project Site.*

The project site land is owned by the County of Maui and it has elected to use this land for the proposed project. There are several nearby existing and planned residential areas, including single and multi-family housing lots.

Potential Impacts and Proposed Mitigation

The proposed project is an infill development within an existing urban area and is therefore consistent with established land uses in the region. There are no anticipated adverse impacts to the land use or ownership at the proposed project location nor are there any proposed or anticipated mitigation measures that are anticipated to be required.

[42] 2013, February 1. County of Maui, Department of Housing and Human Concerns, Housing Division. *Affordable Sales Price Guidelines.* Retrieved from: http://hi-mauicounty.civicplus.com/documents/13/43/2013%20Workforce%20Hsg%20-%20Affordable%20Sales%20Guidelines%20Based%20on%202011%20AS%20Data_201301311256273559.pdf

Photograph 6-1: View of Longs from the Project Site
Photo Credit: Clifford Planning and Architecture LLC. June 20, 2013.

6.3 Historic and Archaeological Resources

The proposed project site consists of open, undeveloped area that was subject to previous extensive mass grading for the Kulamalu Project (TMK (2) 2-3-008:por. 038, 039)[43] in 1997. Prior to the mass grading activities, an Archaeological Reconnaissance Survey (1996, March) was undertaken for TMK (2) 2-3-008: portion of lot 005, which encompasses a portion of the Kulamalu Subdivision. Findings from the Archaeological Reconnaissance Survey included two previously recorded sites, (SIHP Nos. 50-50-10-1061 and 50-50-10-1062). Both sites are located outside of the project area in the adjacent gulches identified previously. Two newly recorded sites (SIHP Nos. 50-50-10-4179 and 50-50-10-4178) were also found in branches of the two gulches identified along with two unrecorded collections of rock in the adjoining property. One of the new sites identified during the survey, but after test unit excavations, the site was deemed no longer significant as the only artifacts found were associated with historic to modern agriculture.

Another Archaeological Reconnaissance Survey was conducted for the Pukalani Project Area (1996, February). Similar to the Kulamalu Project's Archaeological Reconnaissance Survey, the surveyed Pukalani Project Area encompasses the current Kulamalu Subdivision. One petroglyph site was found near the project boundary and was subsequently handled according to the State of Hawai'i Historic Preservation Division's recommendations. See *Appendix A, Record of Consultations.*

During the process of mass grading for the proposed Kulamalu Affordable Housing property no archaeological or historical remains were found. The Kulamalu Affordable Housing property has been subject to previous site disturbance and largely consists of fill material with the maximum depth of twelve feet or 3.7 meters.

Potential Impacts and Proposed Mitigation

An archaeological monitoring plan will be developed by the CoM for approval by SHPD prior to the commencement of any construction activities for the proposed project. Excavation of native grades for the Kulamalu Affordable Housing will be limited to the uppermost slope of the project site which comprises of a small portion of the entire site. Once grading activities commence for the proposed project, if cultural or archaeological remains are found, construction will halt immediately and SHPD will be contacted for further guidance and a qualified archaeologist will be on-site for all ground altering activities during the early phases of the project, and for all excavations that are planned to proceed below one meter in depth. However, if the excavation proves to be entirely contained within sterile fill, then monitoring activities may be switched to an on-call basis following direct consultation with SHPD.

[43] 1997, July 25. *Final Environmental Assessment Kulamalu Project*. Retrieved from: http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Maui/1990s/1997-08-08-MA-FEA-KULAMALU.pdf

6.4 Cultural Impact Assessment

The proposed Kulamalu Affordable Housing project site has been previously altered and the site is devoid of cultural remains. Further, the ground altering activities have cleared the site of all botanical resources. Thus, if traditional cultural practices were conducted on the site, those practices have long ago ceased.

Potential Impacts and Proposed Mitigation

In the event that culturally significant remains are found, SHPD will be contacted and a qualified archaeologist will be on-site for all ground altering activities during the early phases of the project, and for all excavations that are planned to proceed below one meter in depth. However, if the excavation proves to be entirely contained within sterile fill, then monitoring activities may be switched to an on-call basis following direct consultation with SHPD.

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7.0 Relationship to Land Use Plans, Policies and Controls of the Potentially Affected Area

7.1 Overview

State of Hawaiʻi and County of Maui land use policies, plans, and controls are established to guide development in a manner that enhances the environment and quality of life. They are also designed to help ensure that the long-term social, economic, environmental, and land use needs of the community and region can be met.

The proposed project's relationship to land use policies, plans, and controls for the region and proposed activity are as discussed in the following subsections.

7.2 Hawaiʻi State Plan

The Hawaiʻi State Plan, adopted in 1978, and promulgated in Chapter 226, HRS, consists of three major parts:

> Part I, describes the overall theme including Hawaiʻi's desired future and quality of life as expressed in goals, objectives, and policies.
>
> Part II, Planning Coordination and Implementation, describes a statewide planning system designed to coordinate and guide all major state and county activities and to implement the goals, objectives, policies, and priority guidelines of the Hawaiʻi State Plan.
>
> Part III, Priority Guidelines, which express the pursuit of desirable courses of action in major areas of statewide concern.

The proposed project is consistent with the objectives and policies of the Hawaiʻi State Plan because Kulamalu Affordable Housing advances Section 19(3)of the Hawaiʻi State Plan's Objectives and Policies for Socio-Cultural Advancement by enhancing accessibility to affordable housing for Maui Island residents.

§226-19 Objectives and policies for socio-cultural advancement--housing. (a)[44]

Planning for the State's socio- cultural advancement with regard to housing shall be directed toward the achievement of the following objectives:

(1) Greater opportunities for Hawaiʻi's people to secure reasonably priced, safe, sanitary, and livable homes, located in suitable environments that satisfactorily accommodate the needs and desires of families and individuals, through collaboration and cooperation between government and nonprofit and for-profit

[44] Hawaiʻi State Planning Act. Part I Overall Theme, Goals, Objectives and Policies. Chapter 226 Section 19. Objectives and policies for socio-cultural advancement—housing. (a).
Retrieved from: http://hawaii2050.org/images/uploads/HRS226_StatePlanningAct.pdf

developers to ensure that more affordable housing is made available to very low-, low- and moderate-income segments of Hawai'i's population.

(2) The orderly development of residential areas sensitive to community needs and other land uses.

(3) The development and provision of affordable rental housing by the State to meet the housing needs of Hawai'i's people.

(b) To achieve the housing objectives, it shall be the policy of this State to:

(1) Effectively accommodate the housing needs of Hawai'i's people.

(2) Stimulate and promote feasible approaches that increase housing choices for low income, moderate-income, and gap-group households.

(3) Increase homeownership and rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing.

(4) Promote appropriate improvement, rehabilitation, and maintenance of existing housing units and residential areas.

(5) Promote design and location of housing developments taking into account the physical setting, accessibility to public facilities and services, and other concerns of existing communities and surrounding areas.

(6) Facilitate the use of available vacant, developable, and underutilized urban lands for housing.

(7) Foster a variety of lifestyles traditional to Hawai'i through the design and maintenance of neighborhoods that reflect the culture and values of the community.

The design and development of this project will further address the housing demands of the community by providing affordable, multi-family housing. The project will be developed in accordance with all laws and regulations necessary to ensure that adverse environmental effects are mitigated.

7.3 State Land Use Law

Pursuant to Chapter 205, HRS, all lands in the state have been placed into one of four major land use districts by the State Land Use Commission. These are designated "Urban," Rural," "Agricultural," and "Conservation." Kulamalu Affordable Housing is located within the "Urban" land use district. Housing is a permitted use on "Urban" land. The proposed project is consistent with the objectives and policies of the State Land Use Designations (SLUD) therefore no mitigation is proposed.

7.4 Coastal Zone Management Program

All land and water use activities in the state must comply with Chapter 205A, HRS, Hawai'i Coastal Zone Law. The State of Hawai'i designates the Coastal Zone Management Program (CZMP) within the Office of Planning to manage the intent, purpose and provisions of Chapter 205(A)-2, HRS, as amended. The CZMP maintains jurisdiction over all land and ocean resources within the jurisdiction of the State.

According to a letter dated September 19, 2013, the State of Hawai'i Office of Planning does not deem that the proposed project requires a Hawai'i CZMP federal consistency review. See *Appendix A, Record of Consultations*.

7.5 Special Management Area (SMA) Rules and Regulations

The proposed project does not involve Special Management Area (SMA) lands. SMA rules and regulations therefore are not applicable to the proposed project.

7.6 County of Maui General Plan 2030

Kulamalu Affordable Housing is conformant with the goals of the Maui County General Plan 2030, and addresses the priority areas of housing, land use, and directed growth plans. Within the Maui County General Plan 2030, the Countywide Policy Plan (adopted March 3, 2010) establishes the broad goals, objectives, policies, and implementing action and provides the policy framework employed in the Maui Island Plan and each of Maui's Community Plans.
The following [Maui] Countywide Policy Plan goals and objectives are relevant to the proposed action.

E. Expand Housing Opportunities for Residents
Goal: Quality, island-appropriate housing will be available to all residents.
Objective 1. Reduce the affordable housing deficit for residents.
Objective 2. Increase the mix of housing types in towns and neighborhood to promote sustainable land use planning, expand consumer choice, and protect the County's rural and small-town character.
Objective 3. Increase and maintain the affordable housing inventory.

J. Promote Sustainable Land Use and Growth Management
Goal: Community character, lifestyles, economies, and natural assets will be preserved by managing growth and using land in a sustainable manner.
Objective 1. Improve land use management and implement a directed-growth strategy.

Objective 3. Design all developments to be in harmony with the environment and to protect each community's sense of place[45].

Kulamalu Affordable Housing with its 64 multi-family housing units, offers expanded opportunities to access mixed, affordable housing. The Maui County General Plan 2030 designates the land use district within the project location as "Country Town Business." The "Country Town Business" district allows for a mixture of retail, offices, residential, entertainment enterprises, and related accessory uses. The proposed Kulamalu Affordable Housing project is a permitted use within the "Country Town Business" district.

[45] 2010. County of Maui 2030 General Plan, Countywide Policy Plan. Ordinance No. 3732. Retrieved from: http://www.co.maui.hi.us/documents/17/69/241/PublishedWholeCWPPredo121510.PDF

7.7 Makawao-Pukalani-Kula Community Plan[46]

The subject parcel for the proposed project falls under the purview of the Makawao-Pukalani-Kula Community Plan (1996), which is one of nine CoM established regions with a Community District Plan (CDP). Planning for each region is guided by the respective Community Plans, which are designed to implement the Maui County General Plan 2030. Each Community Plan contains recommendations and standards that intended to guide the sequencing, patterns, and characteristics of future development in the region.

The Makawao-Pukalani-Kula Community Plan (1996) identifies the lack of affordable housing as one of the area's major challenges. The Kulamalu Affordable Housing Project is conformant with the Maui County General Plan's objectives and policies for the following.

1. *Land Use*
   "Encourage new residential developments in areas which are contiguous extensions of, or infills within the established residential pattern, and which do not adversely affect agricultural uses."
   The proposed Kulamalu Affordable Housing is an infill project within an existing area. Furthermore, the project site has not been used for agricultural purposes for several decades.
2. *Housing*
   "Provide a mixture of housing types, smaller lot sizes, and coordinated assistance programs aimed at lowering housing costs and expanding housing opportunities."
   The proposed project is designed explicitly for two-story multi-family housing that utilizes less land than many of the surrounding area's residential housing.
3. *Urban Design*
   Encourage mixed land uses, and greenways/generously landscaped common areas where ever possible, utilize design standards for multi-family residential uses, and maintain a mandatory height limitation of 35-feet.
   The proposed Kulamalu Affordable Housing project is consistent with the objectives of each of the three Community Plan subject areas listed above: the project is an infill project that will not affect agricultural uses; it provides a mix of multifamily housing units that is space efficient and cost effective in its use of the land; and will provide landscaped open space common areas. The proposed project will provide a substantial amount of landscaping, within the project's periphery.

46 The Makawao-Pukalani-Kula Community Plan (Last updated in 1996).
Retrieved from: http://www.co.maui.hi.us/documents/17/69/240/makawao.pdf

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8.0 Alternatives to Proposed Action

8.1 Introduction

The proposed project is based on the consideration of the No-Action, Delayed Action, and developed project alternatives.

8.2 No-Action Alternative

The No Action Alternative proposes to maintain the vacancy of the project site, leaving it unchanged. Without the construction of new buildings and the demand placed on utilities' services, the No Action Alternative will avoid the potential for environmental impacts. The No Action Alternative however does not address the purpose of the project which is to help meet some of the demand for affordable housing on Maui. Because the No Action Alternative would fail to address this requirement, it is removed from further consideration.

8.3 Delayed Alternative Action

The Delayed Action Alternative was also considered among the options available to the proposed action. This alternative would develop the project, but will postpone construction to a later, undetermined time. Construction expenditures for the proposed project would be averted in the short-term but would eventually be required at a future date when the project is undertaken. The cost of constructing the proposed project at a later time is expected to be higher due to increases in inflation and price escalation of labor and materials. Producer price indexes as reported by the U.S. Census Bureau indicate that construction materials' costs have continued to rise over time and have risen by a total average of 39 percent between 1990 and 2010[47]. Wages in the United States have been on the rise. Between 2011 and 2012 the U.S. average weekly wage increased by 4.7 percent to $1,000 in the fourth quarter of 2012[48].

The potential for environmental impacts associated with delaying the proposed action are expected to be similar to the preferred alternative and would not involve significant adverse impacts.

The Delayed Alternative similar to the No-Action Alternative would not address the objectives of this project. Housing demand on Maui is expected to continue as a result of the projected population increases, and with time more households would continue to experience difficulty in meeting the financial requirements for the purchase of a new home, i.e., producing a conventional down payment of approximately 20 percent of the purchase cost, and meeting sufficient income requirements. The

[47] 2010. U.S. Census Bureau, Statistical Abstract of the United States. *Table 962*. *Construction Materials—Producer Price Indexes: 1990 to 2010*. Retrieved from: http://www.census.gov/compendia/statab/2012/tables/12s0962.pdf

[48] 2013, June 27. United States Department of Labor, Bureau of Labor Statistics. *County Employment and Wages Summary*. Retrieved from: http://www.bls.gov/news.release/cewqtr.nr0.htm

Delayed Action Alternative would therefore fail to address the purpose of the proposed project; to provide affordable and available housing, it is also removed from further consideration.

8.4 Preferred Alternative

The Preferred Alternative is to proceed with the proposed project involving the construction of an affordable multi-family housing units on an approximately four acre parcel. The project will provide seven two-story buildings with 64 housing units, a community center, and 128 parking stalls with a connection to ʻŌhiʻa Ku Street. See *Figure 3-1, Proposed Kulamalu Affordable Housing, Sheet A-1*, and *Figure 3-2*, *Proposed Kulamalu Community Center*. The Preferred Alternative addresses the demand for affordable housing, and conforms to existing zoning and land use regulations of the State and County, and would be developed in such a manner as to avoid the potential for adverse environmental effects as documented in this environmental assessment.

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9.0 Permits and Approvals That May Be Required

9.1 State of Hawai‘i

- Department of Health National Pollutant Discharge Elimination System (NPDES) Permit.

9.2 County of Maui

- Building Permit;
- Certification of Occupancy Permit;
- Country Town Design Review;
- Drainage Approval;
- Driveway Permit;
- Electrical Permit;
- Fire Protection Permit;
- Grading and Grubbing;
- Planned Development Approval;
- Subdivision;
- Plumbing Permit; and
- Work on County Highway Permit.

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10.0 Agencies, Organizations and Individuals Consulted for the Draft Environmental Assessment

Note: One asterisk (*) denotes that a party did not respond to pre-consultation request, they will however be provided with a DEA.

10.1 Federal Government

Environmental Protection Agency, Region 9;

Department of the Army, U. S. Army Corps of Engineers;

U.S. Fish and Wildlife Service.

10.2 State of Hawaiʻi

Department of Accounting and General Services;

Department of Business, Economic Development and Tourism*;

Department of Education;

Department of Health, Indoor and Radiological Health Branch*;

Department of Land and Natural Resources, State Historic Preservation Branch, and State Parks;

Department of Transportation;

Hawai'i Housing Finance and Development Corporation*;

Office of Hawaiian Affairs*;

Office of Planning, Coastal Zone Management Program.

10.3 County of Maui

Each Member of the Maui County Council*;

Department of Environmental Management;

Department of Fire and Public Safety;

Department of Parks and Recreation;

Department of Public Works;

Department of Water Supply;

Planning Department;

Police Department.

10.4 Organizations and Individuals

Dowling Company;

Hawaiian Telcom;

Maui Campus, Kamehameha Schools*;

Kula Community Association;

Oceanic Time Warner Cable of Hawaiʻi*;

University of Hawaiʻi Institute for Astronomy*.

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11.0 Summary of Impacts and Significance Determination

11.1 Short-Term Impacts

The potential for short-term impacts resulting from the proposed project includes:

- Increased noise due to the operation of construction machinery and equipment;
- Disruption to local area traffic due to the movement of construction vehicles transporting equipment and work crews, and the delivery of building materials by suppliers; and
- Increased generation of dust and the potential for construction related erosion of soils during storm events.

Short term impacts due to noise will be addressed through compliance with the provisions of Chapter 11-43, Community Noise Control, HAR. All internal combustion powered vehicles and equipment will be equipped with mufflers or other noise attenuation devices as required by State and County laws and regulations.

Disruption to local area traffic will be limited to the Institute for Astronomy and residences along ʻŌhiʻa Ku Street, a commercial center adjoining Kupaoa Street to the east, and private residences located to the north, across from ʻAʻapueo Parkway. There are presently no developments to the immediate south and northwest. Disruption to local area residents, business, and commercial users will be addressed with the use of appropriate construction signage and flag personnel when moving heavy equipment, or when deliveries are made.

The potential for dust generation will be addressed through the use of water or soil amendment. Water will be spread using a tanker truck on exposed surfaces susceptible to the generation of dust. In order to conserve water, the minimal amount of water will be used to wet the soils without causing runoff. Alternatively, a soil amendment may be applied to exposed surfaces to reduce the generation of windblown dust and sediments. The CoM will recommend that the contractor regularly monitor the project site to ensure that dust control is practiced when needed, especially during high wind conditions that exceed 10 – 15 mph.

Protection against the erosion of construction related soils and sediments will be addressed through compliance with the conditions of a NPDES Construction Storm Water Permit, which will be filed for this proposed project. BMPs and other methods, measures, and controls will be applied to the project so as to control storm water related runoff from the site. The controls implemented may include but are not limited to the use of vegetative, structural and management measures as prescribed in Chapter 11-55, Water Pollution Control, HAR.

The potential for short-term impacts listed above, are not anticipated to result in secondary or cumulative impacts beyond the planned temporary period of construction. All anticipated short-term impacts will be addressed through the use of appropriate mitigation measures and BMPs to either minimize or eliminate the potential for adverse effects.

11.2 Long-Term Impacts

The construction of the proposed project is not anticipated to result in significant adverse long-term effects to the surrounding climate, water or air quality, biological resources, or socioeconomic conditions in the area or region, due to the application of the proposed mitigative measures as provided in this environmental assessment.

The proposed project will be limited to the development of a site that has been subject to previous extensive grading and earthwork. Development of the proposed project site will be limited to the construction of an affordable housing project within a limited land area with no further expansion or development proposed. There are no plans for other residential, business, or commercial uses within the proposed project site.

To ensure against the potential for adverse effects to any historic or archaeological resources that may be inadvertently uncovered, the CoM will recommend that the contractor adhere to the legal requirements of Chapter 6E, Historic Preservation, HRS, and will immediately stop all work in the area if remains are found. SHPD will be immediately notified at (808) 692-8015 at its main office in Honolulu, or (808) 243-1285, on Maui, for further instruction and appropriate action. Work will only be allowed to be resumed upon the approval of SHPD.

11.3 Significance Criteria Evaluation

In accordance with the content requirements of Chapter 343, HRS, and the significance criteria in Section 11-200-12, HAR, an applicant or agency must determine whether an action may have significant impacts on the environment, including all phases of the project, both primary and secondary expected consequences, cumulative impact with other projects, and short and long term effects. In making the determination, the established thirteen "Significance Criteria" are applied to identify whether significant environmental impacts will occur. According to Section 11-200-12, HAR, an action shall be determined to have a significant impact on the environment if it meets any one of the following criteria.

> *Criteria 1 - Involves an irrevocable commitment to loss or destruction of natural or cultural resources;*

The proposed project does not commit resources or energy that will involve an irrevocable commitment to loss or destruction of natural or cultural resources. Because the site was previously cleared and graded, the natural features of the land have been altered. Further, there are not cultural features on the land.

> *Criteria 2 - Curtails the range of beneficial uses of the environment;*

The proposed project site is located on undeveloped land within the existing property. The planned area of use is presently unused, with rocky soil and little vegetation. Development of the site is not anticipated to significantly detract from the function or use of the environment. Potential for negative adverse environmental impacts will be addressed through adherence to the mitigation measures and practices as described in this document.

Criteria 3 - Conflicts with the State's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS

The proposed project is consistent with the environmental policies, goals, and guidelines expressed in Chapter 343, HRS. Potential sources of adverse impacts have been identified within this Draft Environmental Assessment and appropriate measures have been developed to either mitigate or minimize the potential for impacts.

Criteria 4 - Substantially affects the economic or social welfare of the community or State

The proposed project will be limited to the construction of a relatively small scale residential development comprising a total of 64 multifamily housing units. Although the project may provide construction activity and employment opportunities to the construction industry, the work will be of limited duration and will end upon the completion of the project.

The availability of the affordable multifamily housing units, however, will make rentals available to several families who might not otherwise be provided with the opportunity to purchase their own home.

Criteria 5 – Substantially affects the public health

Factors affecting public health, including air quality, water quality, solid waste, noise, and other items were assessed and will be addressed through the application of appropriate mitigation measures and practices. Mitigation measures and practices have been identified within this Draft Environmental Assessment to address the potential for negative adverse impacts to public health and safety of the community.

Criteria 6 – Involves substantial secondary impacts, such as population changes or effects on public facilities

Development of the proposed project will not result in substantial secondary or cumulative impacts to the natural or built environment or to the social and economic wellbeing of the community. The proposed project will not stimulate an unexpected change in population, but will accommodate a small part of the existing market for affordable housing on Maui. The proposed project will utilize an existing undeveloped site and will require the construction of appropriate utility connections to public and private facilities, i.e. roads, water and wastewater, and power and communications utilities, but will not place significant additional burden on those facilities.

Criteria 7 – Involves a substantial degradation of environmental quality

Analysis of air and water quality, soils and topography, flora and faunal resources, and land use associated with the construction of the proposed project has determined that environmental quality will not be substantially degraded.

Criteria 8 – Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions

The proposed project will be developed in accordance with federal, state, and county laws, regulations, and policies. The proposed facility is under development to provide for the provision of 64 affordable housing units. Although the project will not meet the total demand for affordable housing on Maui, there are no further plans for expansion or development.

Criteria 9 - Substantially affects a rare, threatened, or endangered species, or its habitat;

The potential for adverse effects to rare, threatened or endangered species or habitat is not anticipated. The project site has been heavily modified by grading and earthwork and vegetation present is routinely maintained by CoM.

As noted in Section 4.7 Flora and Fauna, of this Draft Environmental Assessment, the project site is not expected to serve as habitat or forage area for Newell's shearwater (*Puffinus auricularis newelli*) and Hawaiian petrel (*Pterodroma sandwichensis*). These species however may overfly the area and become affected or injured by outdoor artificial lighting and utility lines. Mitigation to reduce the potential for adverse impacts to these species should include providing shielded lighting for outdoor fixtures. Further consultation with DLNR will also be undertaken to identify other possible mitigative measures that may be employed. These additional measures will be further described in the project's Final EA.

Criteria 10 – Detrimentally affects air or water quality or ambient noise levels;

As required, any potential impacts to air, water quality, or noise levels will be addressed through the implementation of appropriate mitigation measures described in this Draft Environmental Assessment as per HRS, Chapter 343.

Criteria 11 – Affects or is likely to suffer damage by being located in an environmentally sensitive area, such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, freshwater, or coastal waters;

The project is not located in the 100-year or 500-year floodplain, the tsunami inundation area, near a shoreline or erosion-prone area or a geologically hazardous area, and is not immediately adjacent to any water body.

Criteria 12 – Substantially affects scenic vistas and view planes identified in county or state plans or studies;

The project development will change the area's aesthetic environment by adding seven building structures, irrigated landscaping, a parking lot, and two driveways connecting the project to the ʻŌhiʻa Ku Street. However, this will not obstruct views to Haleakalā and the West Maui Mountains.

Criteria 13 – Requires substantial energy consumption.

The facilities identified in this project will not consume a substantial amount of energy. Construction activities will result in a short-term increase in power demand, but the increase will be of short duration and will cease upon project completion.

11.4 Preliminary Determination

Based on the Section 11-200-12, HAR Significance Criteria evaluation and the information contained in this Draft Environmental Assessment, it is preliminarily determined that a Finding of No Significant Impact (FONSI) will be issued for this project.

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APPENDIX A. RECORD OF CONSULTATIONS

Federal Consultations

- Environmental Protection Agency, Region 9;
- Department of the Army, U.S. Army Corps of Engineers;
- U.S. Fish and Wildlife Services.

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:

13-0161
Kulamalu Project

August 23, 2013

Mr. Chester Koga, AICP
R. M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, Hawaii 96819

Dear Mr. Koga:

SUBJECT: Request for Determination of Compliance with the Toxic/Hazardous/Radioactive Materials, Contamination, Chemicals or Gases Act (24 CFR 58.5(i)(2)) for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment
TMK: (2) 2-3-066: 012, 013, and 014, Makawao District, Maui, Hawaii

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your letter dated August 13, 2013. Thank you for allowing us to review and comment on the subject document. The document was routed to the Department of Health's Solid & Hazardous Waste Branch, Indoor Radiological Health Branch, Hazard Evaluation & Emergency Response Office and the Maui District Health Office. They will provide specific comments to you if necessary. EPO recommends that you review the Standard Comments found on our website: http://health.hawaii.gov/epo/home/landuse-planning-review-program/. You are required to adhere to all Standard Comments specifically applicable to this application.

EPO suggests that you examine the many sources available on strategies to support the sustainable design of communities, including the:

- U.S. Environmental Protection Agency's report, "Creating Equitable, Health and Sustainable Communities: Strategies for Advancing Smart Grants, Environmental Justice, and Equitable Development" (Feb. 2013), http://www.epa.gov/smartgrowth/pdf/equitable-dev/equitable-development-report-508-011713b.pdf;
- U.S. Environmental Protection Agency's sustainability programs: www.epa.gov/sustainability;
- U.S. Green Building Council's LEED program: www.new.usgbc.org/leed; and
- World Health Organization, www.who.int/hia.

The DOH encourages everyone to apply these sustainability strategies and principles early in the planning and review of projects. We also request that for future projects you consider conducting a Health Impact Assessment (HIA). More information is available at www.cdc.gov/healthyplaces/hia.htm. We request you share all of this information with others to increase community awareness on sustainable, innovative, inspirational, and healthy community design.

We wish to receive notice of the environmental assessment's availability when it is completed. We request a written response confirming receipt of this letter and any other letters you receive from DOH in regards to this submission. You may mail your response to: 919 Ala Moana Blvd., Ste. 312, Honolulu, Hawaii 96814. However, we would prefer an email submission to epo@doh.hawaii.gov. We anticipate that our letter(s) and your response(s) will be included in the final document. If you have any questions, please contact me at (808) 586-4337.

Mahalo,

Laura Leialoha Phillips McIntyre, AICP
Manager, Environmental Planning Office

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

LORRIN W. PANG, M.D., M.P.H.
DISTRICT HEALTH OFFICER

STATE OF HAWAII
DEPARTMENT OF HEALTH
MAUI DISTRICT HEALTH OFFICE
54 HIGH STREET
WAILUKU, HAWAII 96793

August 28, 2013

Mr. Chester Koga, AICP
Project Coordinator
R. M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, Hawaii 96819

Dear Mr. Koga:

Subject: Request for Determination of Compliance with Toxic/Hazardous/Radioactive Materials, Contamination, Chemicals or Gases Act for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment, Makawao District, Maui, Hawaii TMK: (2) 2-3-066:012, 013, and 014

Thank you for the opportunity to review this project. We have the no comments to offer.

It is strongly recommended that the Standard Comments found at the Department's website: http://health.hawaii.gov/epo/home/landuse-planning-review-program/ be reviewed, and any comments specifically applicable to this project should be adhered to.

Should you have any questions, please call me at 808 984-8230 or E-mail me at patricia.kitkowski@doh.hawaii.gov.

Sincerely,

Patti Kitkowski

Patti Kitkowski
District Environmental Health Program Chief

c EPO

2024 N. King Street
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R. M. TOWILL CORPORATION
SINCE 1930

Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Project and Construction Management

October 21, 2013

Ms. Laura Leialoha Phillips McIntyre, Manager
Environmental Planning Office
Department of Health
State of Hawai'i
P.O. Box 3378
Honolulu, Hawai'i 96801-3378

Dear Ms. Phillips McIntyre:

Request for Determination of Compliance with the Toxic/Hazardous/ Radioactive Materials, Contamination, Chemicals or Gases Act (24 CFR 58.5(i)(2)) for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated August 23, 2013, concerning the proposed project. We acknowledge the Department of Health's (DOH) standards relating to land use, planning and best management practices. We will further examine your recommended strategies for sustainable design. Comments received by you will be included in the project's Draft Environmental Assessment.

Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

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Photogrammetry
Surveying
Project and Construction Management

October 21, 2013

Ms. Patti Kitowski, District Environmental Health Program Chief
Maui District Health Office
Department of Health
State of Hawai'i
54 High Street
Wailuku, Hawai'i 96793

Dear Ms. Kitowski:

Request for Determination of Compliance with the Toxic/Hazardous/ Radioactive Materials, Contamination, Chemicals or Gases Act (24 CFR 58.5(i)(2)) for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated August 28, 2013 concerning the proposed project. We acknowledge the Department of Health's (DOH) standards relating to land use, planning and best management practices. We will further examine your recommended strategies for sustainable design. Comments received by you will be included in the project's Draft Environmental Assessment.

Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

DEPARTMENT OF THE ARMY
HONOLULU DISTRICT, U.S. ARMY CORPS OF ENGINEERS
FORT SHAFTER, HAWAII 96858-5440

September 10, 2013

Regulatory Branch

File Number **POH-2013-00160**

R.M. Towill Corporation
Attention: Chester Koga
2024 North King Street, Suite 200
Honolulu, Hawaii 96819-3494

NO PERMIT REQUIRED

Dear Mr. Koga:

This responds to your August 13, 2013 letter requesting the Department of the Army (DA) comments for a draft Environmental Assessment (EA) prepared for the proposed Kulamalu Affordable Housing project at TMKs (2) 2-3-066: 012, 013, and 014, Pukalani, Makawao District, Maui Isle, Hawaii. Reference number **POH-2013-00160** is assigned this project. Please cite this reference number in any future correspondence concerning this project.

We have completed review of the information submitted pursuant to our authorities under Section 10 of the Rivers and Harbors Act of 1899 (Section 10) and Section 404 of the Clean Water Act (Section 404). For your information, Section 10 requires that a DA permit be obtained from the U.S. Army Corps of Engineers (Corps) prior to undertaking any construction, dredging, or other activity occurring in, over, or under or affecting navigable waters of the U.S. For tidal waters, the shoreward limit of the Corps' jurisdiction extends to the Mean High Water Mark. Section 404 requires that a DA permit be obtained for the discharge (placement) of dredged and/or fill material into waters of the U.S., including wetlands. For tidally influenced waters, in the absence of adjacent wetlands, the shoreward limit of the Corps' jurisdiction extends to the High Tide Line, which in Hawai'i may be approximated by reference to the Mean Higher High Water Mark. For non-tidal waters, the lateral limits of the Corps' jurisdiction extend to the Ordinary High Water Mark or the approved delineated boundary of any adjacent wetlands.

Based on the information you submitted, it appears the project site consist entirely of uplands and absent of waters of the U.S. We anticipate the proposed 4.179-acre housing development project and appurtenant structures will not involve the discharge of fill material into waters of the U.S.; **therefore, a DA permit is not required**. This determination does not relieve you of the responsibility to obtain any other permits, licenses, or approvals that may be required under County, State, or Federal law for your proposed work.

Thank you for contacting us regarding this project and providing us with the opportunity to comment. Should you have any questions, please contact Ms. Joy Anamizu at 808-835-4308 or via e-mail at *Joy.N.Anamizu@usace.army.mil*.

Sincerely,

George P. Young, P.E.
Chief, Regulatory Branch

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

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Planning
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Project and Construction Management

October 21, 2013

Mr. George P. Young, Chief
Honolulu Engineer District
United States Army Corps of Engineers
Building 230, Room 302
Fort Shafter, Hawai'i 96585

Dear Chief Young:

Floodplain Management (24 CFR 55, Executive Order 11988), Wetlands Protection (Executive Order 11988), and Flood Disaster Protection Act (24 CFR 58.6) Consultation for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i
Reference File Number POH-2013-00160

Thank you for your letter dated September 10, 2013, relating to the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *Based on the information you submitted, it appears the project site consist entirely of uplands and absent of waters of the U.S. We anticipate the proposed 4.179-acre housing development project and appurtenant structures will not involve the discharge of fill material into waters of the U.S.; therefore, a DA permit is not required.*

We acknowledge your assessment that a Department of the Army (DA) permit is not required for Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act. Comments received by DA branches will be included in the project's Draft Environmental Assessment in accordance with Hawai'i Revised Statues, Chapter 343; the National Environmental Policy Act; and, U. S. Department of Housing and Urban Development.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850

In Reply Refer To:
2013-TA-0420

SEP 11 2013

Mr. Chester Koga
Project Coordinator
R.M. Towill Corporation
2024 North King Street
Honolulu, Hawaii 96819-3494

Subject: Technical Assistance for the Proposed Kulamalu Housing Complex, Maui

Dear Mr. Koga:

The U.S. Fish and Wildlife Service (Service) received your letter on July 14, 2013, requesting comment on the proposed development of a 64-unit housing complex on 4.179 acres at the Kulamalu Town Center [TMK (2) 2-3-008:038, 039], on Maui.

Project Description
The proposed project involves the construction of 64 housing units, a community center, 133 parking stalls, a loading zone, and two driveways on vacant land within the Kulamalu Town Center west of the Kula Highway on Maui. Proposed construction is anticipated to begin in the late summer or fall of 2014

Species Affected
Based on information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Program, five species protected by the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*), may occur within, or transit through, the proposed action area and could be impacted by the proposed action: the endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*), Blackburn's sphinx moth (*Manduca blackburni*), Hawaiian goose (*Branta sandvicensis*), Hawaiian petrel (*Pterodroma sandwichensis*), and the threatened Newell's shearwater (*Puffinus auricularis newelli*).

To help you minimize potential impacts to listed species, the Service is providing you the following avoidance and minimization measures. Please note that implementation of these measures does not ensure that impacts to listed species can be avoided, and further coordination with the Service on compliance with the ESA may be required.

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- The Hawaiian hoary bat is known to occur throughout the island of Maui. This bat roosts in both exotic and native woody vegetation and, while foraging, leaves young unattended in "nursery" trees and shrubs. If trees or shrubs suitable for bat roosting are cleared during the hoary bat breeding season (June 1 to September 15), there is a risk that young bats could inadvertently be harmed or killed. As a result, the Service recommends that woody plants greater than 15 feet tall should not be removed or trimmed during the Hawaiian hoary bat breeding season.

- The Blackburn's sphinx moth may presently breed and feed within the proposed action area. Adult moths feed on nectar from native plants, including beach morning glory (*Ipomoea pes-caprae*), iliee (*Plumbago zeylanica*), and maiapilo (*Capparis sandwichiana*); larvae feed upon non-native tree tobacco (*Nicotiana glauca*) and native aiea (*Nothocestrum latifolium*). Blackburn's sphinx moth pupae may occupy the soil within 35 feet of larval host plants for up to a year. The Service recommends that a qualified biologist survey the project area, and areas adjacent to the project footprint, for the presence of native and non-native Blackburn's sphinx moth host plants. We also recommend that these surveys be conducted during the wettest portion of the year (usually November-April) and approximately four to eight weeks following a significant rainfall event. Surveys should include looking for eggs, larvae, and signs of larval feeding (chewed stems, frass, or leaf damage). If presence of the Blackburn's sphinx moth is confirmed, the Service should be contacted for further guidance.

- Due to its range and foraging behavior, the Hawaiian goose may be present in the vicinity of the proposed action at any time of the year. If a Hawaiian goose appears within 100 feet of ongoing construction work, all activity shall be temporarily suspended until the bird moves off to a safe distance of its own volition. Moreover, if any number of Hawaiian geese are observed loafing or foraging within the area of the proposed project during the Hawaiian goose breeding season (October through April), a biologist familiar with the nesting behavior of the Hawaiian goose should survey in and around the proposed construction footprint prior to the resumption of any work, or after any subsequent delay of work of three or more days (during which the birds may attempt to nest). If a nest is discovered within a radius of 150 feet of proposed construction work, or a previously undiscovered nest is found within said radius after work begins, all work must cease immediately and the Service contacted for further guidance.

- The Hawaiian petrel and Newell's shearwater, collectively referred to as seabirds, may transit through the proposed action area while flying between the ocean and nesting sites in the mountains during their breeding season (March through December). Seabird fatalities resulting from collisions with artificial structures that extend above the surrounding vegetation have been documented in Hawaii where high densities of transiting seabirds occur. Additionally, outdoor artificial lighting such as flood lighting for construction work, security, and outdoor illumination can adversely impact seabirds by causing disorientation which may result in collision with utility lines, buildings, fences, and vehicles. Fledging seabirds are especially affected by artificial lighting and have a tendency to exhaust themselves while circling the light sources and become grounded. Too weak to fly, these birds become vulnerable to depredation by feral

predators such as dogs, cats, and mongoose. Therefore, the Service recommends that project-related lighting should be minimized. All project-related lights should be shielded so the bulb is not visible at or above bulb-height.

The Service also recommends that a biosecurity assessment be conducted to address the potential impacts of invasive species introduction and transport due to the advent of construction-related materials and heavy vehicles into the action area during the construction phase of the proposed project. Accordingly, the Service can provide guidelines for invasive species containment and mitigation through Best Management Practices upon request.

If you have any questions concerning the recommendations or comments provided in this letter, please contact Ian Bordenave, Fish and Wildlife Biologist, at (808) 792-9400.

Sincerely,

Jess Newton

for Loyal Mehrhoff
Field Supervisor

2024 North King Street
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Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

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October 21, 2013

Mr. Loyal Mehroff, Field Supervisor
Pacific Islands Fish and Wildlife Office
United States Department of the Interior
300 Ala Moana Boulevard, Box 50088
Honolulu, Hawai'i 96850-5000

Dear Mr. Mehroff:

Section 7 Endangered Species Act (50 CFR 402) Consultation for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 11, 2013, concerning the proposed project. We offer the following in response to your comments (your comments have been italicized for reference):

> *The U.S. Fish and Wildlife Service (Service) received your letter on July 14, 2013, requesting comment on the proposed development of a 64-unit housing complex on 4.179 acres at the Kulamalu Town Center [TMK (2) 2-3-008:038, 039], on Maui.*

We wish to clarify that the letter sent to you was dated August 13, 2013, the project name is Kulamalu Affordable Housing, and is located at tax map key (TMK): (2) 2-3-066: 012, 013 and 014. The area of the project remains the same at 4.179 acres.

> *To help you minimize potential impacts to listed species, the Service is providing you the following avoidance and minimization measures. Please note that implementation of these measures does not ensure that impacts to listed species can be avoided, and further coordination with the Service on compliance with the ESA may be required.*

The project site has been subject to previous mass grading in 1997. Since the County of Maui acquired the property in 2011, it has commissioned the routine maintenance of the site whereby foliage is trimmed. During the maintenance of the site, no listed, endangered or threatened species have been discovered. However, mitigation measures for potentially impacted, endangered or threatened species set forth by the U. S. Fish & Wildlife Service (USFWS) will be pursued where necessary. USFWS will be contacted if habitat, forage sites, or individual species of the Hawaiian Hoary Bat (*Lasiurus cinereus semotus*), Blackburn's Sphinx Moth (*Manduca blackburni*), and the Hawaiian Goose (*Branta sandvicensis*) are encountered at the project site. The purpose for contacting the USFWS should these species be discovered is to ensure that appropriate mitigative measures can be applied to avoid the potential for adverse effects.

- *The Hawaiian hoary bat is known to occur throughout the island of Maui This bat roosts in both exotic and native woody vegetation and, while foraging, leaves young unattended in "nursery" trees and shrubs. If trees or shrubs suitable for bat roosting are cleared during the hoary bat breeding season (June 1 to September 15), there is a risk that young bats could*

inadvertently be harmed or killed. As a result, the Service recommends that woody plants greater than 15 feet tall should not be removed or trimmed during the Hawaiian hoary bat breeding season. [added underscore]

The project site has been subject to extensive grading and clearing and it is largely devoid of trees and foliage. All plant life on the project site is routinely maintained by the County of Maui. However, this guidance is acknowledged and will be considered during the scheduling of construction activities to minimize harm to this endangered species.

- *The Blackburn's sphinx moth may presently breed and feed within the proposed action area. Adult moths feed on nectar from native plants, including beach morning glory (Ipomoea pes-caprae), iliee (Plumbago zeylanica), and maiapilo (Capparis sandwichiana); larvae feed upon non-native tree tobacco (Nicotiana glauca) and native aiea (Nothocestrum latifolium). Blackburn's sphinx moth pupae may occupy the soil within 35 feet of larval host plants for up to a year. The Service recommends that a qualified biologist survey the project area, and areas adjacent to the project footprint, for the presence of native and non-native Blackburn's sphinx moth host plants. [added underscore] We also recommend that these surveys be conducted during the wettest portion of the year (usually November-April) and approximately four to eight weeks following a significant rainfall event. Surveys should include looking for eggs, larvae, and signs of larval feeding (chewed stems, frass [SIC], or leaf damage). If presence of the Blackburn's sphinx moth is confirmed, the Service should be contacted for further guidance.*

As noted above, the project site has been extensively cleared, is devoid of much vegetative cover and is routinely maintained by the County of Maui. The areas surrounding the project site have also been cleared and would not appear to provide suitable habitat for the Blackburn's sphinx moth.

- *Due to its range and foraging behavior, the Hawaiian goose may be present in the vicinity of the proposed action at any time of the year. If a Hawaiian goose appears within 100 feet of ongoing construction work, all activity shall be temporarily suspended until the bird moves off to a safe distance of its own volition. Moreover, if any number of Hawaiian geese are observed loafing or foraging within the area of the proposed project during the Hawaiian goose breeding season (October through April), a biologist familiar with the nesting behavior of the Hawaiian goose should survey in and around the proposed construction footprint prior to the resumption of any work, or after any subsequent delay of work of three or more days (during which the birds may attempt to nest). If a nest is discovered within a radius of 150 feet of proposed construction work, or a previously undiscovered nest is found within said radius after work begins, all work must cease immediately and the Service contacted for further guidance.*

This guidance pertaining to the Hawaiian Goose or Nēnē is acknowledged. Since the County of Maui acquired the property in 2011, no signs of the Nēnē have been found. The USFWS shall also be consulted, if required, to ensure that appropriate actions are taken.

- *The Hawaiian petrel and Newell's shearwater, collectively referred to as seabirds, may transit through the proposed action area while flying between the ocean and nesting sites in the mountains during their breeding season (March through December). Seabird fatalities resulting from collisions with artificial structures that extend above the surrounding vegetation have been documented in Hawai'i where high densities of transiting seabirds occur. Additionally, outdoor artificial lighting such as flood lighting for construction work, security, and outdoor illumination can adversely impact seabirds by causing disorientation which may result in collision with utility lines, buildings, fences, and vehicles. Fledging seabirds are especially affected by artificial lighting and have a tendency to exhaust themselves while circling the light sources and become grounded. Too weak to fly, these birds become vulnerable to depredation by feral predators such as dogs, cats, and mongoose. Therefore, the Service recommends that project-related lighting should be minimized. All project-related lights should be shielded so the bulb is not visible at or above bulb-height. [added underscore]*

Project related artificial outdoor lighting will be shielded to cast lighting downward to mitigate any potential impacts to the Hawaiian petrel (*Pterodroma sandwichensis*) and Newell's shearwater (*Puffinus newelli*). The use and need for outdoor lighting will also be minimized as reasonable while addressing safety and security of the public.

> *The Service also recommends that a biosecurity assessment be conducted to address the potential impacts of invasive species introduction and transport due to the advent of construction-related materials and heavy vehicles into the action area during the construction phase of the proposed project. Accordingly, the Service can provide guidelines for invasive species containment and mitigation through Best Management Practices upon request.*

The County of Maui will request-that the contractor implement mitigation strategies to minimize the potential for invasive species introduction due to transportation of construction-related materials and heavy vehicles into the project area during construction. Because the project site is mass graded and has been routinely disturbed for the past few years, a biosecurity assessment is not expected to be required.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

State Consultations

- Department of Accounting and General Services;
- Department of Business, Economic Development and Tourism (DBEDT);
- Department of Education;
- Department of Health, Indoor and Radiological Health Branch*;
- Department of Land and Natural Resources (DLNR);
- Department of Transportation;
- Hawai'i Housing Finance and Development Corporation*;
- Office of Planning, Coastal Zone Management Program;
- Office of Hawaiian Affairs*.

NEIL ABERCROMBIE
GOVERNOR

Dean H. Seki
Comptroller

Maria E. Zielinski
Deputy Comptroller

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

(P)1183.3

AUG 26 2013

Mr. Chester Koga, AICP
R. M. Towill Corporation
2024 North King Street
Honolulu, Hawaii 96819-3494

Dear Mr. Koga:

Subject: Proposed Kulamalu Affordable Housing Draft EA
TMK: (2) 2-3-066:012,013,014 Makawao District
Makawao District, Maui, Hawaii

Thank you for the opportunity to provide comments for the subject project. The proposed project location does not impact any Department of Accounting and General Services' existing facilities in the area and we have no comments to offer at this time.

If you have any questions, please call me at 586-0400 or your staff may call Mr. Alva Nakamura of the Public Works Division at 586-0488.

Sincerely,

DEAN H. SEKI
Comptroller

c: Ms. JoAnn Ridao, Dept. of Housing and Human Concerns, County of Maui
Mr. Danny Agsalog, Dept. of Finance, County of Maui
Mr. Wade Shimabukuro, DAGS Maui office

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October 21, 2013

Mr. Dean H. Seki, Comptroller
Department of Accounting and General Services
State of Hawai'i
1151 Punchbowl Street
Honolulu, Hawai'i 96813

Dear Mr. Seki:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated August 26, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *The proposed project location does not impact any Department of Accounting and General Services' existing facilities in the area and we have no comments to offer at this time.*

We acknowledge that the State of Hawai'i Department of Accounting and General Services does not have any comments to offer as the proposed project location does not impact any Department of Accounting and General Services' existing facilities in the area.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui
Maui District Office, Department of Accounting and General Services, State of Hawai'i

Danny Agsalog, Director
Department of Finance, County of Maui

NEIL ABERCROMBIE
GOVERNOR

KATHRYN S. MATAYOSHI
SUPERINTENDENT

STATE OF HAWAI`I
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAI`I 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

August 29, 2013

Mr. Chester Koga
Project Coordinator
R.M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, Hawaii 96707

Dear Mr. Koga:

SUBJECT: **Consultation Prior to the Draft Environmental Assessment for Kulamalu Affordable Housing, Makawao District, Maui, Hawaii**

The Department of Education (DOE) is responding to your letter of August 13, 2013 requesting preliminary comments on a proposed housing project with 64 multi-family units in Pukalani, Maui. There is sufficient space in the DOE schools that serve Pukalani to accommodate students who will live in the project.

Thank you for this opportunity to offer our comments. Should you have any questions, please call Heidi Meeker of the Facilities Development Branch at 377-8301.

Respectfully,

Kenneth G. Masden
Public Works Manager
Planning Section

KGM:jmb

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October 21, 2013

Ms. Katharyn Matayoshi, Superintendent
Department of Education
State of Hawai'i
1390 Miller Street
Honolulu, Hawai'i 96813

Dear Ms. Matayoshi:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated August 29, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *There is sufficient space in the DOE schools that serve Pukalani to accommodate students who will live in the project.*

Thank you for informing us that the State of Hawai'i Department of Education (DOE) has sufficient space in the DOE schools that serve the Pukalani area to accommodate students who will live in the project.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Alvin Shima, Complex Area Superintendent
Baldwin-Kekaulike-Maui, Department of Education

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ESTHER KIA'AINA
FIRST DEPUTY

WILLIAM M. TAM
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

HISTORIC PRESERVATION DIVISION
DEPARTMENT OF LAND AND NATURAL RESOURCES

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

September 19, 2013

Mr. Chester Koga
R.M. Towill Corporation
2024 North King Street, Suite 200
Honolulu HI 96819

LOG NO: 2013.4842
DOC NO: 1309JP11
Archaeology

Aloha Mr. Koga:

SUBJECT: Chapters 6E-42 and 343 Historic Preservation Review-
Consultation for the Kulamalu Affordable Housing Draft Environmental Assessment
A'apueo Ahupua'a, Makawao District, Maui Island
TMK: (2) 2-3-066:012, 013, and 014 (Formerly portion of 2-3-008:044)

Thank you for the opportunity to provide consultation regarding the submittal letter for the proposed Kulamalu affordable housing project, which was received by our office on August 14, 2013. The Department of Housing and Human Concerns, County of Maui proposed to construct Kulamalu Affordable Housing, a project consisting of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone, and two concrete driveways.

The 4.179 acre project site is located in Pukalani, adjacent to the University of Hawai'i Institute for Astronomy and west of Kula Highway. The proposed project will be developed on vacant land within the 53.67 acre Kulamalu Town Center, also known as the Kulamalu Commercial Subdivision. We previously provided comments for the Kulamalu development (*Doc 9712BD35-36; Log 1998.20843, Doc 9801CD18; Log 1999.24075, Doc 9909RC06; Log 1999.23869, Doc 9905CD03; Log 1999.23869, Doc 9907CD31; Log 2000.25597, Doc 0006CD07; Log 2000.28125, Doc 0008CD31; Log 2001.26839, Doc 0101MK08; Log 2001.30948, Doc 0102CD01; Doc 0210MK16; Doc 0210CD23; Log 2003.26931, Doc 0301CD07; Log 2003.2175, Doc 0310MK20; Log 2003.2176, Doc 0310MK21; Log 2003.0053, Doc 0303CD42; Log 2003.0363, Doc 0304CD28; Log 2003.0364, Doc 0304CD29; Log 2003.0953, Doc 0306MK30; Log 2003.1151, Doc 0307CD12; Log 2003.2123, Doc 0310MK16; Log 2003.2124, Doc 0310MK17; Log 2003.2175, Doc 0310MK20; Log 2005.0403, Doc 0503MK02; Log 2005.2405, Doc 0511MK31; and Log 2006.2667, Doc 0608MK02).*

Contrary to the information submitted in your request for consultation, there have been several historic properties documented within the Kulamalu development and listed on the State Inventory of Historic Places (SIHP), including the Kalialinui Petroglyphs in the southwest portion of Kulamalu (SIHP 50-50-10-1061) and the Kaluapulani Petroglyphs (SIHP 50-50-10-1062). Two additional petroglyph panels were documented in a branch (possibly Ha'akakai Gulch) of the same gulch (SIHP 50-50-10-4179). An agricultural site (SIHP 50-50-10-4181) and a boundary wall were also recorded (SIHP 50-50-10-4180).

Mass excavation activities for the originally proposed retention basin at Kulamalu uncovered a significant historic archaeological site (SIHP 50-50-10-5173). The site was identified beneath the pineapple till zone and is comprised of a Historic Cemetery with at least 15 individuals (8 burials in wooden coffins and 7 in pit features), water worn grave markers, 5 associated burning episodes, 4 unexcavated pit features, and 1 disturbed animal burial. A rock mound was also documented with associated fire vestige that yielded a date of A.D. 1450-1660 (SIHP 50-50-10-5469) and a drainage or irrigation ditch (SIHP 50-50-10-5470).

There are significant historic archaeological sites in the vicinity, including at least 32 petroglyphs located on a panel across the Kula Highway northeast (upslope) of the subject area (SIHP 50-50-10-2920). The Pukalani Petroglyphs (SIHP 50-50-10-1231) and the Hamakua Burial Cave (SIHP 50-50-10-1264) are both located at a lower elevation in the same gulch.

The Cemetery (50-50-10-5173) and petroglyph sites (50-50-10-1061, 1062, and 4179) are designated for permanent preservation. We consistently recommended archaeological monitoring for ground altering activities at Kulamalu. We have accepted an archaeological monitoring plan (Archaeological Services Hawaii, LLC.) indicating that archaeological monitoring shall be conducted in all areas where original soils will be encountered.

Some areas have been previously monitored and consist of "fill" and much of the area previously consisted of rock/cinder that was blasted. In contrast, some of the areas still consist of original undisturbed soil. At this time, our records do not adequately reflect information to determine the status of the exact location of previously disturbed and original contexts. We also do not have any construction plans for the proposed affordable housing project so we are unable to provide mitigation recommendations at this time.

Subsequently, we recommend that additional information be submitted with respect to the proposed project, in order to identify, document, or provide mitigation recommendations for documented or potentially undocumented cultural features that may be encountered during the project. Please contact Jenny Pickett at (808) 243-1285 or Jenny.L.Pickett@Hawaii.gov for any questions or concerns about this letter.

Mahalo,

Theresa Donham
Archaeology Branch Chief

cc: County of Maui, Department of Planning via email: planning@mauicounty.gov
County of Maui DSA via fax to: (808) 270-7972
Ingrid Friedberg (ingridf@rmtowill.com)

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

R. M. TOWILL CORPORATION
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Project and Construction Management

October 21, 2013

Ms. Jenny Pickett, Maui-Assistant Archaeologist
Maui Office, State Historic Preservation Division
Department of Land and Natural Resources
601 Kamokila Boulevard, Room 555
Kapolei, Hawai'i 96707

Dear Ms. Pickett:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i
Reference: LOG NO: 2013.4842; DOC NO: 1309JP11

Thank you for your letter dated September 19, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *Contrary to the information submitted in your request for consultation, there have been several historic properties documented within the Kulamalu development and listed on the State Inventory of Historic Places (SIHP), including the Kalialinui Petroglyphs in the southwest portion of Kulamalu (SIHP 50-50-10-1061) and the Kaluapulani Petroglyphs (SIHP 50-50-10-1062). Two additional petroglyph panels were documented in a branch (possibly Ha'akakai Gulch) of the same gulch (SIHP 50-50-10-4179). An agricultural site (SIHP 50-50-10-4181) and a boundary wall were also recorded (SIHP 50-50-10-4180).*

We have noted that historic properties have been identified on neighboring sites within the Kulamalu Commercial Subdivision. The County of Maui will engage an archaeologist consultant prior to the permitting stage in order to prepare a monitoring plan.

> *Mass excavation activities for the originally proposed retention basin at Kulamalu uncovered a significant historic archaeological site (SIHP 50-50-10-5173). The site was identified beneath the pineapple till zone and is comprised of a Historic Cemetery with at least 15 individuals (8 burials in wooden coffins and 7 in pit features), water worn grave markers, 5 associated burning episodes, 4 unexcavated pit features, and 1 disturbed animal burial. A rock mound was also documented with associated fire vestige that yielded a date of A.D. 1450-1660 (SIHP 50-50-10-5469) and a drainage or irrigation ditch (SIHP 50-50-10-5470).*

The Kulamalu Affordable Housing property has been subject to previous site disturbance and largely consists of cut areas or fill material. Excavation of native grades for the Kulamalu Affordable Housing will be limited to the uppermost slope of the project site which comprises of a small portion of the entire site. Once grading activities commence for the proposed project, if remains are found, construction will halt immediately and the State Historic Preservation Division (SHPD) will be contacted for further guidance.

> *There are significant historic archaeological sites in the vicinity, including at least 32 petroglyphs located on a panel across the Kula Highway northeast (upslope) of the subject area (SIHP 50-50-10-2920). The Pukalani Petroglyphs (SIHP 50-50-10-1231) and the Hamakua Burial Cave (SIHP 50-50-10-1264) are both located at a lower elevation in the same gulch.*

In the event that remains are found during the limited grading activities, construction will be halted, and the State Historic Preservation Division (SHPD) will be contacted for further guidance. An archaeological monitor will also be present to monitor all ground altering activities.

> *The Cemetery (50-50-10-5173) and petroglyph sites (50-50-10-1061, 1062, and 4179) are designated for permanent preservation. We consistently recommended archaeological monitoring for ground altering activities at Kulamalu. We have accepted an archaeological monitoring plan (Archaeological Services Hawaii, LLC.) indicating that archaeological monitoring shall be conducted in all areas where original soils will be encountered.*

The archaeological monitoring plan will be prepared prior to the permitting stage will be adhered to during construction. In the event that historic properties are encountered during any ground altering activities on the proposed project site, construction activities will be halted immediately and SHPD will be contacted for further guidance.

> *Some areas have been previously monitored and consist of "fill" and much of the area previously consisted of rock/cinder that was blasted. In contrast, some of the areas still consist of original undisturbed soil. At this time, our records do not adequately reflect information to determine the status of the exact location of previously disturbed and original contexts. We also do not have any construction plans for the proposed affordable housing project so we are unable to provide mitigation recommendations at this time.*

Because your records do not adequately reflect information to determine the status of the previously disturbed and original context, an archaeological monitor will be present for all ground monitoring activities.

> *Subsequently, we recommend that additional information be submitted with respect to the proposed project, in order to identify, document, or provide mitigation recommendations for documented or potentially undocumented cultural features that may be encountered during the project. Please contact Jenny Pickett at (808) 243-1285 or Jenny.L.Pickett@Hawaii.gov for any questions or concerns about this letter.*

It may be possible to accommodate your request for additional information depending on the type of information that is requested. Please specify the type of information you would like and we will make every reasonable accommodation to address your request.

We appreciate this opportunity to respond. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Nicki Ann Thompson, Interim Administrator
Department of Land and Natural Resources, State of Hawai'i

Theresa Donham, Archaeology Branch Chief
Department of Land and Natural Resources, State of Hawai'i

Chester Koga

From: Lauren.A.Tanaka@hawaii.gov
Sent: Friday, September 27, 2013 10:05 AM
To: Chester Koga
Subject: Proposed Kulamalu Affordable Housing Draft EA; TMK: (2) 2-3-066: 012, 013, and 014; Makawao, Maui

Hi Chester:

We have no comments to offer on the proposed project.

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

R. M. TOWILL CORPORATION
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October 21, 2013

Mr. Dan Quinn, Administrator
Division of State Parks
Department of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, Hawai'i 96793

Dear Mr. Quinn:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your e-mail dated September 27, 2013, concerning the proposed project. We acknowledge that you have no comments to offer.

We appreciate your review of the subject document. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

NEIL ABERCROMBIE
GOVERNOR

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

IN REPLY REFER TO:
STP 8.1307

September 5, 2013

Mr. Chester Koga, AICP
Project Coordinator
R. M. Towill Corporation
2014 North King Street, Suite 200
Honolulu, Hawaii 96819-3494

Dear Mr. Koga:

Subject: Kulamalu Affordable Housing
Early Consultation for Draft Environmental Assessment
TMK: (2) 2-3-066:012, 013, and 014

Thank you for requesting the State Department of Transportation's (DOT) review of the subject project.

DOT understands the applicant proposes to develop Kulamalu Affordable Housing, a 4.179-acre project consisting of 64 housing units, a community center, 133 parking stalls one loading zone and two concrete driveways. Access to the project will be from Ohia Ku Street.

The Draft Environmental Assessment (DEA) should discuss and evaluate the project's contribution to the cumulative traffic impacts on State highways facilities in the area.

DOT appreciates the opportunity to provide comments. If there are any questions, please contact Mr. Gary Ashikawa of the DOT Highways Planning Branch at telephone number (808) 587-6336.

Very truly yours,

GLENN M. OKIMOTO, Ph.D.
Director of Transportation

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

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October 21, 2013

Mr. Glenn Okimoto, Director
Department of Transportation
Ali'ia'imoku Building
869 Punchbowl Street, Room 513
Honolulu, Hawai'i 96813

Dear Mr. Okimoto:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 5, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *The Draft Environmental Assessment in accordance with Hawai'i Revised Statues, Chapter 343; the National Environmental Policy Act; and, U. S. Department of Housing and Urban Development (DEA) should discuss and evaluate the project's contribution to the cumulative traffic impacts on State highways facilities in the area.*

The Draft Environmental Assessment in accordance with Hawai'i Revised Statues, Chapter 343; the National Environmental Policy Act; and, U. S. Department of Housing and Urban Development, will discuss and evaluate the proposed project's contribution to cumulative traffic in the area. As appropriate, mitigation measures will be recommended in the project's Draft Environmental Assessment.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

OFFICE OF PLANNING
STATE OF HAWAII

NEIL ABERCROMBIE
GOVERNOR

JESSE K. SOUKI
DIRECTOR
OFFICE OF PLANNING

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

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: http://hawaii.gov/dbedt/op/

Ref. No. P-14082

August 19, 2013

Mr. Chester Koga
R. M. Towill Corporation
2024 N. King Street, Suite 200
Honolulu, Hawaii 96819

Dear Mr. Koga:

Subject: Hawaii Coastal Zone Management (CZM) Program Federal Consistency Review for U.S. Department of Housing and Urban Development (HUD) Funding for the Proposed Kulamalu Affordable Housing, Makawao, Maui

This responds to your request for CZM federal consistency review for HUD funding for the proposed Kulamalu Affordable Housing Project in Makawao, Maui. The proposed use of funding from HUD does not require Hawaii CZM Program federal consistency review. The Hawaii CZM Program does not review any HUD assistance programs, grants, or loans for federal consistency in accordance with Section 307(d) of the Coastal Zone Management Act and 15 CFR Part 930. There are no HUD assistance programs identified on the Hawaii CZM Program listing of federal assistance programs subject to consistency review, pursuant to 15 CFR §930.95.

The Office of Planning, as the lead agency for the Hawaii CZM Program, does not review actions relevant to the Coastal Resources Act/Coastal Barrier Improvement Act. Therefore, we do not provide consultation reviews relevant to this act.

This CZM federal consistency statement does not represent an endorsement of the project nor does it convey approval with any regulations administered by any state or county agency. If you have any questions, please call John Nakagawa of our CZM program at 587-2878.

Sincerely,

Jesse K. Souki
Director

c: Ms. Jo-Ann Ridao,
Department of Housing and Human Concerns, County of Maui
Department of Planning, County of Maui

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
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Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

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October 21, 2013

Mr. Jesse K. Souki, Director
Office of Planning
State of Hawai'i
P.O. Box 2359
Honolulu, Hawai'i 96804-2359

Dear Mr. Souki:

Consultation and Request for Consistency Determination of Coastal Zone Management Act (Sections (c), (d)), and Coastal Resources Act/Coastal Barrier Improvement Act (Section 58.6(c)) for the Proposed Kulamalu Affordable Housing Draft Environmental Assessment TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 19, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *The proposed use of funding from HUD does not require Hawai'i CZM Program federal consistency review. The Hawai'i CZM Program does not review any HUD assistance programs, grants, or loans for federal consistency in accordance with Section 307(d) of the Coastal Zone Management Act and 15 CFR Part 930. There are no HUD assistance programs identified on the Hawai'i CZM Program listing of federal assistance programs subject to consistency review, pursuant to 15 CFR §930.95.*

We acknowledge that the Hawai'i CZM Program does not review any HUD assistance programs, grants or loans for federal consistency because there are no HUD assistance programs identified on the Hawai'i CZM Program listing of federal assistance programs subject to consistency review.

We appreciate your review of the subject document. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui
Leo Asuncion, Planning Program Manager
Coastal Zone Management Program, Office of Planning, State of Hawai'i

County of Maui Consultations

- Each Member of the Maui County Council*;
- Department of Environmental Management;
- Department of Fire and Public Safety;
- Department of Parks and Recreation;
- Department of Public Works;
- Department of Water Supply;
- Planning Department;
- Police Department.

ALAN M. ARAKAWA
Mayor

KYLE K. GINOZA, P.E.
Director

MICHAEL M. MIYAMOTO
Deputy Director

TRACY TAKAMINE, P.E.
Solid Waste Division

ERIC NAKAGAWA, P.E.
Wastewater Reclamation Division

COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
2200 MAIN STREET, SUITE 100
WAILUKU, MAUI, HAWAII 96793

October 10, 2013

Mr. Chester Koga
R.M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, Hawaii 96819

Dear Mr. Koga:

SUBJECT: KULAMALU AFFORDABLE HOUSING
EARLY CONSULTATION FOR DRAFT EA
TMK (2) 2-3-066:012, 013, AND 014, MAKAWAO, MAUI

We reviewed the subject application and have the following comments:

1. Solid Waste Division comments:

   a. Include a plan for construction waste management.

2. Wastewater Reclamation Division (WWRD) comments:

   a. The County does not have a wastewater system in the area of the subject project.

If you have any questions regarding this memorandum, please contact Michael Miyamoto at 270-8230.

Sincerely,

KYLE K. GINOZA, P.E.
Director of Environmental Management

xc: Jo-Ann Ridao, Director
County of Maui
Department of Housing and Human Concerns
One Main Plaza
2200 Main Street, Suite 546
Wailuku, Hawaii 96793

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

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October 21, 2013

Mr. Kyle K. Ginoza, P.E., Director
Department of Environmental Management
2200 Main Street, Suite 100
Wailuku, Hawai'i 96793

Dear Mr. Ginoza,

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter of October 10, 2013. In response to your comments, we offer the following:

1. Include a plan for construction waste management.
   Response: The project contractor will be responsible for the proper disposal of construction waste.

2. The County does not have a wastewater system in the area of the subject projects.
   Response: Wastewater from the subject project will be accommodated by a private system in the Pukalani area.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Chester Koga

From: Peter Davis <Peter.Davis@co.maui.hi.us>
Sent: Friday, August 30, 2013 8:43 AM
To: Chester Koga
Subject: Emailing: KD- Early Consultation for the proposed Kulamalu Affordable Housing DEA0.wpd
Attachments: WordPerfect 6.1

Sorry, the first letter was dated wrong.

The message is ready to be sent with the following file or link attachments:

KD- Early Consultation for the proposed Kulamalu Affordable Housing DEA0.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Lt. P. Kono Davis

County of Maui
Department of Fire
and Public Safety

Fire Prevention Bureau
313 Manea Pl.
Wailuku, HI 96793

808-244-9161 ext.25
808-244-1363 Fax
808-357-5036 Cell

Peter.Davis@co.maui.hi.us

Date: August 30, 2013

To: R.M. Towill Corporation
Chester Koga, AICP
2024 North King Street, suite 200
Honolulu, HI 97819

Subject: Early Consultation for the proposed Kulamalu Affordable Housing DEA
Makawao District, Maui, Hawaii
(2) 2-3-066:012, 013 and 014

Dear Chester,

Thank you for allowing the Fire Prevention Bureau the opportunity to comment on the above said project. Our department reserves the right to comment officially during the plan review process.

If there are more than 14 dwelling units in one building, the possibility of fire sprinklers for fire protection may be implemented. Without seeing an actual plan, we can safely say that the fire flow for this project may range between 1500 GPM's to 2000 GPM's, depending on the approach of the fire protection.

Please be aware that by June of 2014, the County of Maui, will be under a new fire code with amendments. The Hawaii State Fire Code, based on the NFPA 1 Uniformed Fire Code 2006, along with the County of Maui's amendments will be in effect.

If there are any questions, please feel free to contact me by mail or at 244-9161 ext. 25.

Sincerely,

Kono Davis
Lieutenant, Fire Prevention Bureau

cc: Jo-Ann Ridao, Director
Department of Housing & Human Concerns
County of Maui
313 Manea Place
Wailuku, HI 96793

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
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eMail rmtowill@hawaii.rr.com

R. M. TOWILL CORPORATION
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Project and Construction Management

October 21, 2013

Mr. Jeffrey A. Murray, Fire Chief
Fire and Public Safety
County of Maui
200 Dairy Road
Kahului, Hawai'i 96733

Dear Mr. Murray:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated August 30, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *Our department reserves the right to comment officially during the plan review process.*

Your right to comment officially during the plan review process is acknowledged. You will receive a copy of the Draft Environmental Assessment upon its availability.

> *If there are more than 14 dwelling units in one building, the possibility of fire sprinklers for fire protection may be implemented. Without seeing an actual plan, we can safely say that the fire flow for this project may range between 1500 GPMs to 2000 GPMs, depending on the approach of the fire protection.*

For buildings comprised of more than 14 dwelling units, the use of fire sprinklers will be considered among the possible options for fire protection. Fire protection that is provided for Kulamalu Affordable Housing will comply with the most up to date County of Maui Code.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

ALAN M. ARAKAWA
Mayor

GLENN T. CORREA
Director

BRIANNE SAVAGE
Deputy Director

(808) 270-7230
FAX (808) 270-7934

DEPARTMENT OF PARKS & RECREATION

700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

September 16, 2013

Chester Koga, AICP
R. M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, HI 96819

Dear Mr. Koga:

SUBJECT: Draft Environmental Assessment for Proposed Kulamalu Affordable Housing, Makawao, Maui, Hawaii TMK (2) 2-3-066:012, 013, 014

Thank you for the opportunity to review the subject Early Consultation Request.

The fiscal year 2013-2014 park assessment fee rate for the Makawao-Pukalani-Kula Community Plan Area is $4,980.00 per unit. Since the 3-unit exemption for this property has been used, all 64 dwelling units will be subject to the park assessment fee. The total fee would be $318,720.00.

Be advised that the aforementioned rate and fees are valid through June 30, 2014, and are subject to change thereafter. Also, the applicant is required to satisfy the applicable park dedication requirements in effect at the time of final subdivision approval, or in this case, issuance of building permit.

Should you have any questions or concerns, please feel free to contact me, or Steve Grogan, Capital Improvements Project Coordinator, at stephen.grogan@co.maui.hi.us or 808-270-6158.

Sincerely,

GLENN T. CORREA
Director of Parks & Recreation

c: Robert Halvorson, Chief of Planning & Development
GTC:RH:sg

S:\PLANNING\Steve G\No Objections\No Objections - Draft EA - Kulamala Affordable Housing R1.doc

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@hawaii.rr.com

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Project and Construction Management

October 21, 2013

Mr. Glenn Correa, Director
Parks and Recreation
County of Maui
700 Hali'a Nakoa Street, Unit 2
Wailuku, Hawai'i 96793

Dear Mr. Correa:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 16, 2013 and October 17, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *The fiscal year 2013-2014 park assessment fee rate for the Makawao-Pukalani-Kula Community Plan Area is $4,980.00 per unit. Since the 3-unit exemption for this property has been used, all 64 dwelling units will be subject to the park assessment fee. The total fee would be $318,720.00.*
>
> *Be advised that the aforementioned rate and fees are valid through June 30,2014, and are subject to change thereafter. Also, the applicant is required to satisfy the applicable park dedication requirements in effect at the time of final subdivision approval, or in this case, issuance of building permit.*

We appreciate your review of the subject project for applicability of park assessment requirements. We acknowledge your letter of October 17, 2013 stated that the subject project is exempt form the park dedication fee.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

ALAN M. ARAKAWA
Mayor

DAVID C. GOODE
Director

ROWENA M. DAGDAG-ANDAYA
Deputy Director

GLEN A. UENO, P.E., P.L.S.
Development Services Administration

CARY YAMASHITA, P.E.
Engineering Division

BRIAN HASHIRO, P.E.
Highways Division

COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS

200 SOUTH HIGH STREET, ROOM NO. 434, WAILUKU, MAUI, HAWAII 96793
Telephone: (808) 270-7845 • Fax: (808) 270-7955

September 6, 2013

Mr. Chester Koga, AICP
Project Coordinator
R. M. TOWILL CORPORATION
2024 North King Street, Suite 200
Honolulu, Hawaii 96819-3494

Dear Mr. Koga:

SUBJECT: CONSULTATION FOR THE PROPOSED KULAMALU AFFORDABLE HOUSING DRAFT ENVIRONMENTAL ASSESSMENT; TMK: (2) 2-3-066:012, 013 AND 014

We reviewed the subject application and have the following comment:

1. Currently all roads abutting the proposed development are privately owned and maintained, and as such, we have no comments. We recommend, however, that all landscaping planted adjacent to roadways and internal parking areas/sidewalks be provided with root barriers to reduce the potential for future problems associated with uplifted pavement and sidewalks.

Please call Rowena M. Dagdag-Andaya at (808) 270-7845 if you have any questions regarding this letter.

Sincerely,

DAVID C. GOODE
Director of Public Works

DCG:RMDA:ls
xc: Highways Division
Engineering Division
S:\LUCA\CZM\prop_kulamalu_afford_hsg_ec_23066012_013_014_ls.wpd

2024 North King Street
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Honolulu, Hawaii 96819-3494
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R. M. TOWILL CORPORATION
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Project and Construction Management

October 21, 2013

Mr. David Goode, Director
Department of Public Works
County of Maui
Kalana o Maui Building
200 South High Street, 4th Floor
Wailuku, Hawai'i 96793

Dear Mr. Goode:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 6, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *Currently all roads abutting the proposed development are privately owned and maintained, and as such, we have no comments. We recommend, however, that all landscaping planted adjacent to roadways and internal parking areas/sidewalks be provided with root barriers to reduce the potential for future problems associated with uplifted pavement and sidewalks.*

Your recommendation for using root barriers on all landscaping planted adjacent to roadways and internal parking areas/sidewalks is noted and will be considered during the project design process.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata, Department of Housing and Human Concerns

ALAN M. ARAKAWA
Mayor

DAVID TAYLOR, P.E.
Director

PAUL J. MEYER
Deputy Director

DEPARTMENT OF WATER SUPPLY
COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793-2155
www.mauiwater.org

September 20, 2013

Mr. Chester Koga, AICP, Project Coordinator
R. M. Towill Corporation
2024 North King Street, Ste. 200
Honolulu, HI 96819-3494

Dear Mr. Koga:

RE: Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066:012, 013, and 014, Makawao District, Maui, Hawai'i

Thank you for the opportunity to provide the following comments on the referenced project.

Background
The project site is served by the Department of Water Supply's (DWS) Lower Kula water system, 12-inch waterlines on Aapueo Parkway and Ohia Ku Street, fire hydrants numbers 473, 662, 663, 664, and 665, and four ¾-inch meters. Storage is provided by the one million gallon Kealaloa tank.

The consultant's projected water demand for the 64-unit project is estimated between 25,600-26,000 gallons per day or approximately 400 gallons per day per unit.

Conclusion and Recommendations
During the building permit process, the applicant will be required to submit domestic and irrigation calculations, approved, and stamped by a licensed architect or engineer, to determine the adequacy of the water meters for the project.

The DWS' goal is to protect the integrity of surface and groundwater resources. To achieve this, mitigation measures must be implemented to prevent any potential water pollution related impacts. Best management practices for construction should, therefore, be applied during construction.

The DWS encourages the applicant to consider the following measures in the

project design, as well as during construction:

- Utilize reclaimed or non-potable water for dust control, irrigation, and other non-potable uses.
- Water after 7:00 p.m. at night and before 10:00 a.m. in the morning.
- Prevent over-watering by automated systems – Provide rain-sensors on all automated irrigation controllers. Check and reset controllers at least once a month to reflect monthly changes in evaporation rates at the site. As an alternative, provide more automated, soil-moisture sensors on controllers.
- Maintain fixtures to prevent leaks – A simple, regular program of repair and maintenance can prevent the loss of hundreds or even thousands of gallons per day.
- Limit irrigated turf – Low-water use shrubs and ground cover can be equally attractive and require substantially less water than turf.
- Select climate adapted native plant species for landscaping – Native plants adapted to the area conserve water and protect the watershed from degradation due to invasive alien species.

Should you have any questions, please contact Arnold Y. Imaye, Staff Planner at Arnold.Imaye@maui.co.hi.us or at (808) 463-3110.

Sincerely,

David Taylor, P.E., Director
ayi
c: DWS Engineering Division
Jo-Ann Ridao, Director, Department of Housing and Human Concerns
DWS Water Resources & Planning Division files

2024 North King Street
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Telephone 808 842 1133
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eMail rmtowill@hawaii.rr.com

R. M. TOWILL CORPORATION
SINCE 1930

Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Project and Construction Management

October 21, 2013

Mr. David Taylor, Director
Department of Water Supply
County of Maui
Kalana o Maui Building
200 South High Street, 5th Floor
Wailuku, Hawai'i 96793

Dear Mr. Taylor:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 20, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *Conclusion and Recommendations*
> *During the building permit process, the applicant will be required to submit domestic and irrigation calculations, approved, and stamped by a licensed architect or engineer, to determine the adequacy of the water meters for the project.*

We acknowledge that all necessary documentation should be submitted in support of the building permit application.

> *Conclusion and Recommendations*
> *The DWS' goal is to protect the integrity of surface and groundwater resources. To achieve this, mitigation measures must be implemented to prevent any potential water pollution related impacts. Best management practices for construction should, therefore, be applied during construction.*

Mitigation measures will be implemented to prevent any potential water pollution related impacts. Best management practices (BMPs) for construction will be applied by the contractor during construction.

> *The DWS encourages the applicant to consider the following measures in the project design, as well as during construction:*
> *o Utilize reclaimed or non-potable water for dust control, irrigation, and other non-potable uses.*
> *o Water after 7:00 p.m. at night and before 10:00 a.m. in the morning.*
> *o Prevent over-watering by automated systems - Provide rain-sensors on all automated irrigation controllers. Check and reset controllers at least once a month to reflect monthly changes in evaporation rates at the site. As an alternative, provide more automated, soil-moisture sensors on controllers.*

- *o Maintain fixtures to prevent leaks - A simple, regular program of repair and maintenance can prevent the loss of hundreds or even thousands of gallons per day.*
- *o Limit irrigated turf - Low-water use shrubs and ground cover can be equally attractive and require substantially less water than turf.*
- *o Select climate adapted native plant species for landscaping - Native plants adapted to the area conserve water and protect the watershed from degradation due to invasive alien species.*

The suggested mitigative measures above are noted. The investigation of alternatives to mitigate the potential for adverse impacts to water use and water quality in the Draft Environmental Assessment will include a description of BMPs to address these concerns.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

ALAN M. ARAKAWA
Mayor

WILLIAM R. SPENCE
Director

MICHELE CHOUTEAU McLEAN
Deputy Director

COUNTY OF MAUI

DEPARTMENT OF PLANNING

November 21, 2013

Mr. Chester Koga, AICP
R.M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, Hawaii 96819

Dear Mr. Koga:

SUBJECT: EARLY CONSULTATION ON PROPOSED KULAMALU AFFORDABLE HOUSING DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR PROPERTY LOCATED AT PUKALANI, ISLAND OF MAUI, HAWAII; TMKS: (2) 2-3-066:012, 013, AND 014 (RFC 2013/0123)

The Department of Planning (Department) is in receipt of the above-referenced request for comments on the preparation of a Draft EA. It is noted that the purpose of the project is to alleviate some of the demand for affordable housing on Maui. The Department supports the purpose of this project.

Please note that the project area has the following land use designations:

State Land Use District:	Urban
Community Plan Designation:	Business Commercial
County Zoning:	B-CT Country Town Business District
Maui Island Plan:	Located with in an urban growth boundary

As stated in your request letter, the proposed project conforms to these designations. In addition to addressing the project's conformance to these designations, please also specifically address the B-CT Country Town Business District zoning intent of retaining the area's small town rustic nature, as well as the specific design guidelines. The Department also suggests that the project be sensitive to the existing Kulamalu design guidelines. Below are additional comments which should be included in the Draft EA:

- Address the Countywide Policy Plan policies, goals and objectives as they relate to the project;
- Address the Maui Island Plan policies, goals, and objectives relevant to this project;
- Address the Makawao-Pukalani-Kula Community Plan objectives, policies and guidelines as they relate to the project;
- Address the availability of water upcountry and the project's water source;

- Identify the wastewater treatment facility to be used for the project;
- Identify the specific units types, such as the number of bedrooms, square footage, etc.;
- Identify which schools will service the community and a safe pedestrian and/or bicycle route to the near by high schools;
- Please identify any pedestrian pathways or bikeways and how residents will access the neighboring commercial areas of Kulamalu; and
- Please also identify safe pedestrian access to the current bus stop, and if applicable, any discussions with the County Department of Transportation and the Kulamalu development owners to locate a bus stop closer to the project.

It is also noted that the Flood Hazard Area Zone is X for all three (3) parcels and that none of the parcels are located in a floodway and the project will not require a flood development permit. The project area is also not located in the special management area or any historic districts.

Thank you for the opportunity to comment. Should you require further clarification, please contact Staff Planner Gina Flammer by email at gina.flammer@mauicounty.gov or by phone at (808) 270-5780.

Sincerely,

CLAYTON I. YOSHIDA, AICP
Planning Program Administrator

for WILLIAM SPENCE
Planning Director

xc: Gina M. Flammer, Staff Planner (PDF)
Jo-Ann Ridao, Director, Department of Housing and Human Concerns
Project File
General File

WRS:CIY:GMF:nt
K:\WP_DOCS\PLANNING\RFC\2013\0123_KulamaluAffordable\Early_Consultation_Kulamalu_Affordable_Housing_Project_Comment_Ltr.doc

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eMail rmtowill@hawaii.rr.com

R. M. TOWILL CORPORATION
SINCE 1930

Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Project and Construction Management

January 22, 2014

Mr. William Spence, Planning Director
Planning Department
County of Maui
Kalana Pakui Building
200 South High Street, Suite 315
Wailuku, Hawai'i 96793

Dear Mr. Spence:

EARLY CONSULTATION ON PROPOSED KULAMALU AFFORDABLE HOUSING DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR PROPERTY LOCATED AT PUKALANI, ISLAND OF MAUI, HAWAII; TMKS: (2) 2-3-066:012, 013, AND 014 (RFC 2013/0123)

Thank you for your letter dated November 21, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

Please note that the project area has the following land use designations:

State Land Use District:	*Urban*
Community Plan Designation:	*Business Commercial*
County Zoning:	*B-CT Country Town Business District*
Maui Island Plan:	*Located with in an urban growth boundary*

As stated in your request letter, the proposed project conforms to these designations.

We acknowledge that proposed project is conformant with the land use designations.

In addition to addressing the project's conformance to these designations, please also specifically address the B-CT Country Town Business District zoning intent of retaining the area's small town rustic nature, as well as the specific design guidelines. The Department also suggests that the project be sensitive to the existing Kulamalu design guidelines. Below are additional comments which should be included in the Draft EA:

- *Address the Countywide Policy Plan policies, goals and objectives as they relate to the project;*
- *Address the Maui Island Plan policies, goals, and objectives relevant to this project;*

- *Address the Makawao-Pukalani-Kula Community Plan objectives, policies and guidelines as they relate to the project;*
- *Address the availability of water upcountry and the project's water source;*
- *Identify the wastewater treatment facility to be used for the project;*
- *Identify the specific units types, such as the number of bedrooms, square footage, etc.;*
- *Identify which schools will service the community and a safe pedestrian and/or bicycle route to the near by high schools;*
- *Please identify any pedestrian pathways or bikeways and how residents will access the neighboring commercial areas of Kulamalu; and*
- *Please also identify safe pedestrian access to the current bus stop, and if applicable, any discussions with the County Department of Transportation and the Kulamalu development owners to locate a bus stop closer to the project.*

Chapter seven, Relationship to Land Use Plans, Policies and Controls of the Potentially Affected Area, within the HRS 343, Draft Environmental Assessment addresses the proposed project's conformity to all applicable County, Island and Community planning documents. In addition, the proposed project's potable water source will be derived from the Wailoa Ditch. Projected water usage for the proposed project ranges between 15,000 to 18,000 gallons per day (gpd) on average with peak days at 18,000 to 20,000 gpd. Recent water quantity and quality testing confirms adequate capacity and good quality of drinking water sources in the Makawao-Kula-Pukalani District.

Wastewater generated by the proposed project will go to its sewer collection system that will connect to the privately owned and operated Hawai'i Water Services treatment facility.

Specific unit types that will be featured at the Kulamalu Affordable Housing project includes 1 bedroom/1 bathroom and 2 bedroom/1 bathroom units. The one bedroom units will have living room space of 593 square feet (sf), 595 sf, and 634 sf. The two bedroom units will have living room spaces ranging from 702 sf to 812 sf. A total of 12 1 bedroom/1 bathroom units, and a total of 24 2 bedroom/2 bathroom units will be construction at Kulamalu Affordable Housing.

Public schools that will service the community includes Pukalani Elementary School, Makawao Elementary School, Samuel Enoka Kalama Intermediate School and Kekaulike High School. According to the Department of Education (DOE), there is sufficient space in the DOE schools that serve Pukalani to accommodate student who will live in the Kulamalu Affordable Housing project.

Existing pedestrian pathways include sidewalks around the project site on ʻŌhiʻa Ku Street and ʻAʻapueo Parkway. Nearby crosswalks are located at the juncture of ʻŌhiʻa Ku Street and ʻAʻapueo Parkway, ʻAʻapueo Parkway and Kupaoa Street, and ʻAʻapueo Parkway and Kula Highway. The Maui Bus-Commuter Service, Kula Villager Route #40, has a bus stop fronting Longs Kulamalu on Kula Highway. This bus route links up with the transfer station, the Pukalani Terrace Shopping Center, where the Maui Public Bus Transit System, Upcountry Islander, Route #40 also stops at. Officially designated bike paths are absent from the proposed project's surrounding streets, however, according to state law, bicyclists have the right to occupy a full lane of traffic as it is legally considered a vehicle and must abide by the same rules and regulations of driving as motorized vehicles.

In addition, the County of Maui is currently looking into the possibility of providing one or more school bus pick up/drop off areas on peripheral roadways in order to mutually benefit the community within the Kulamalu Subdivision.

It is also noted that the Flood Hazard Area Zone is X for all three (3) parcels and that none of the parcels are located in a floodway and the project will not require a flood development permit. The project area is also not located in the special management area or any historic districts.

We acknowledge your concurrence that the proposed project is not located within a floodway, a special management area or a historic district.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

ALAN M. ARAKAWA
MAYOR

OUR REFERENCE

YOUR REFERENCE

POLICE DEPARTMENT

COUNTY OF MAUI

55 MAHALANI STREET
WAILUKU, HAWAII 96793
(808) 244-6400
FAX (808) 244-6411

GARY A. YABUTA
CHIEF OF POLICE

CLAYTON N.Y.W. TOM
DEPUTY CHIEF OF POLICE

September 13, 2013

Mr. Chester Koga, AICP
Project Coordinator
R.M. Towill Corporation
2024 North King Street, Suite 200
Honolulu, HI 96819-3494

Dear Mr. Koga:

SUBJECT: Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013, and 014, Makawao District

This is in response to your letter dated August 13, 2013, requesting comments and information on the above project.

We have reviewed the information submitted and have enclosed a copy of a report submitted by Officer Marjorieann Kahookele-Pea from the Wailuku District.

Thank you for giving us the opportunity to comment on this project.

Sincerely,

Assistant Chief Victor K. Ramos
for: Gary A. Yabuta
Chief of Police

c: William Spence, Dept. of Planning
Jo-Ann Ridao, Dept. of Housing and Human Concerns

Enclosure

TO : **GARY YABUTA, CHIEF OF POLICE, COUNTY OF MAUI**

VIA : **CHANNELS**

FROM : **MARJORIEANN KAHOOKELE-PEA, POIII, COMMUNITY POLICE OFFICER**

SUBJECT : **PUBLIC REVIEW OF DRAFT ENVIRONMENTAL ASSESSMENT (DEA) FOR PROPOSED KULAMALU AFFORDABLE HOUSING, ISLAND OF MAUI, HAWAII**

9/10/13

This communication is submitted as a response to a request for review and comment for public review of Draft Environmental Assessment (DEA) for proposed Kulamalu Affordable Housing on the Island of Maui, Hawaii. The request was sent by Chester KOGA of R. M. Towill Corporation, AICP, Project Coordinator.

PROJECT	:	Central Maui Regional Park
TMK #	:	(2) 3-8-007:101
APPLICANT	:	Department of Housing and Human Concerns County of Maui Attention: Jo-Ann RIDAO, Director of DHHC
CONSULTANT	:	R. M. Towill Corporation Attention: Chester Koga

PROJECT INFORMATION:

The proposed Kulamalu Affordable Housing project consists of the building of four two-story buildings with 64 housing units, a community center, 133 parking stalls, one loading zone and two concrete driveways on a 4.179 acre project site located in Pukalani within the Kulamalu Town Center. This project expects each unit to only house about two residents per household increasing the population to about 128 therefore not significantly altering the need for police protection. The project is scheduled to begin in late to mid 2014.

The project is located within the 53.67 acre Kulamalu Town Center, TMK (2) 2-3-006:012, 013, and 014. This project will be located on the corner of 'A'a Pueo Parkway and Ohi'a Ku Street, across from the University of Hawaii Astronomy Center.

RESPONSE:

In review of the submitted documents, concerns from the police perspective are upon the safety of pedestrian and vehicular movement and with the expansion of the population in the area, additional police protection may be required for the area. There will be an increase in pedestrian and vehicular traffic in the Kulamalu area as a result of the project as well as another proposed project of an elderly housing complex. The affordable housing currently estimates each unit housing only 2 (two) occupants however, many homes house several occupants, including children. The increased population would be estimated at more than 128. Many families also have multiple cars which would increase traffic in this area.

Currently, there are sidewalks, lighting and one exit/entry into Kulamalu area via the intersection of 'A'apueo Parkway and Kula Highway that is used. There is no other alternative routes. Due to the current heavy traffic flow during the before and after school and work hours in this area, I would recommend that an alternative exit/entry into the Kulamalu Area be developed to include another alternative route to the proposed project so traffic may avoid 'A'apueo Parkway which access to Kamehameha Schools is made. This additional housing as well as the additional housing for proposed elderly home, will affect calls for service as well as congest traffic further.

CONCLUSION:

There are no objections to the progression of this project at this time however, from the police standpoint, in regards to pedestrian and vehicular movement, it is recommended that alternative routes be examined for smooth flow and avoidance of any further congestion.

Respectfully Submitted,

Of. Marjorieann L. KAHOOKELE-PEA 15206
Community Oriented Police
September 3rd, 2013@ 1142 Hours

SUGGEST THE RECOMMENDATIONS PROVIDED BY OFF. KAHOOKELE-PEA BE TAKEN INTO CONSIDERATION.
Sgt.
9-5-13 @ 1500

Officer KAHOOKELE-PEA addresses several significant concerns regarding an environmental assessment of the Kulamalu Affordable Housing Project.

Lt. Arthur G. DADEZ E-8480
09/07/2013 @ 0512 Hrs

For review of comments submitted
OK
9/10/13

2024 North King Street
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October 21, 2013

Mr. Gary Yabuta, Chief of Police
Police Department
County of Maui
255 Mahalani Street
Wailuku, Hawai'i 96793

Dear Mr. Yabuta:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 13, 2013 and for forwarding Community Police Officer Majorieann Kahookele-Pea's letter dated September 10, 2013. We have prepared the following in response to your comments (your comments have been italicized for reference):

> *In review of the submitted documents, concerns from the police perspective are upon the safety of pedestrian /and vehicular movement and with the expansion of the population in the area, additional police protection may be required for the area. There will be an increase in pedestrian and vehicular traffic in the Kulamalu area as a result of the project as well as another proposed project of an elderly housing complex. The affordable housing currently estimates each unit housing only 2 (two) occupants however, many homes house several occupants, including children. The increased population would be estimated at more than 128. Many families also have multiple cars which would increase traffic in this area.*

We acknowledge your concerns about the potential need for expanded police protection to maintain the safety of pedestrians and vehicles. The Draft Environmental Assessment will address all necessary and feasible precautions to ensure that pedestrian and vehicular traffic will not impose an additional burden on police service in the area.

> *Currently, there are sidewalks, lighting and one exit/entry into Kulamalu area via the intersection of 'A'apueo Parkway and Kula Highway that is used. There is no other alternative routes. Due to the current heavy traffic flow during the before and after school and work hours in this area, I would recommend that an alternative exit/entry into the Kulamalu Area be developed to include another alternative route to the proposed project so traffic may avoid 'A'apueo Parkway which access to Kamehameha Schools is made. This additional housing as well as the additional housing for proposed elderly home, will affect calls for service as well as congest traffic further.*

We acknowledge your concerns regarding the potential for increased vehicular traffic within the intersection of 'A'apueo Parkway and Kula Highway. Due to budgetary constraints of the proposed affordable housing project, it is infeasible to construct an alternative intersection to the 'A'apueo Parkway and Kula Highway.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Organizations and Individuals

- Dowling Company;
- Hawaiian Telcom;
- Maui Campus, Kamehameha Schools;
- Kula Community Association;
- Oceanic Time Warner Cable of Hawaiʻi
- University of Hawaiʻi Institute for Astronomy.

DOWLING
COMPANY, INC
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August 19, 2013

Mr. Chester Koga
R.M. Towill Corporation
2024 N. King Street, Suite 200
Honolulu, HI 96819

Subject: Proposed County of Maui Kulamalu Affordable Housing Project

Dear Mr. Koga,

Thank you for the opportunity to comment prior to the preparation of a Draft Environmental Assessment for the proposed County of Maui Project.

We are in support of this 64-unit affordable housing Project in Kulamalu. The Upcountry area has limited opportunities for affordable housing both for sale or rental and the Project is sorely needed for the community. The Project site within Kulamalu is conveniently located. It is within walking distance to schools, parks and retail services such as Long's Drugs.

Sincerely,

Everett R. Dowling
President

2005 Main Street • Wailuku, Maui, Hawaii 96793 • Ph(808)244-1500 • Fax(808)242-2777 • www.dowlingco.com

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R. M. TOWILL CORPORATION
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Planning
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Environmental Services
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Project and Construction Management

October 21, 2013

Mr. Everett Dowling, President
Dowling Company, Inc.
2005 Main Street
Wailuku, Hawai'i 96793

Dear Mr. Dowling:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated August 19, 2013, concerning the proposed project. We acknowledge your support for the proposed project.

We appreciate this opportunity to respond to your comments. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Hawaiian Telcom

August 22, 2013

R.M. Towill Corporation
2024 N. King St. Suite 200
Honolulu, HI 96819-3494

ATTN: Chester Koga, AICP

SUBJECT: CONSULTATION FOR THE PROPOSED KULAMALU AFFORDABLE HOUSING DRAFT EA, MAKAWAO DISTRICT, MAUI, HAWAII
TMK: (2) 2-3-006:012, 013, 014

Dear Mr. Koga:

Thank you for providing Hawaiian Telcom Incorporated, the opportunity to comment on the Consultation for the proposed Kulamalu Affordable Housing Draft EA in the district of Makawao on the Island of Maui.

Hawaiian Telcom has no comments on this project at this time.

If there are any questions, please call Sheri Tihada at (808) 242-5258.

Sincerely,

Gerry Saguciо
Sr. Manager - Network Engineering
C: File (3050 1308-033)
S. Tihada

2024 North King Street
Suite 200
Honolulu, Hawaii 96819-3494
Telephone 808 842 1133
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R. M. TOWILL CORPORATION
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Planning
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Photogrammetry
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Project and Construction Management

October 21, 2013

Mr. Eric K. Yeaman
President and Chief Executive Officer
Hawaiian Telecom
1177 Bishop Street
Honolulu, Hawai'i 96732

Dear Mr. Yeaman:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated August 22, 2013, concerning the proposed project. We acknowledge that you do not have any comments to offer at this time.

We appreciate your review of the proposed project. Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

KULA COMMUNITY ASSOCIATION

P.O. Box 417 - Kula, HI 96790

Website: *http://kulamaui.com*

The vision of the Kula Community Association is to preserve open space, support agriculture, maintain a rural residential atmosphere, and to work together as a community.
The specific purpose of this association is to improve the quality of life for the residents of Kula, to promote civic welfare, and generally to benefit the community of Kula.

RE: Proposed Kulamalu Affordable Housing Draft EA September 12, 2013

Mahalo for allowing the Kula Community Association to comment at an early stage in the planning for this project. We ask that you consider our comments:

1. The Kula Community Association is strongly in favor of a project that will provide more affordable homes in the upcountry district.

2. We believe that this location has several advantages: a) near Longs Pharmacy; b) close to the County's Kula bus route; c) near King Kekaulike High School; and d) in proximity to a large recreational ball field.

3. We ask that the Environmental Assessment specifically consider the following:

i. The availability of water and whether it is proper to jump ahead of upcountry residents who have been waiting many years for a water-meter.

ii. The interaction between this project and the large, proposed Hui Mahaolu Senior citizen project that will be built across the street and immediately in front of the main entrance to the affordable housing project. Discuss traffic issues for both projects on that street and where Aapueo Drive intersects with Kula Highway.

iii. The potential for the County's "Maui Bus" (Kula bus route) to enter the Kulamalu project and to come even closer to this affordable housing project and to the adjacent Hui Mahaolu senior housing.

iv. Identification of which elementary school will be impacted and how impacted.

v. The ability of school busses to enter this project and safely pick up students, especially young ones. Will a bus shelter be provided in this windy and often rainy location?

vi. The EA should indicate the use of the three other parcels on this super-block. Will there be any kind of incompatibility or negative interaction (undesirable commercial activities, since these lots are zoned commercial)?

vii. Provide examples of existing housing projects on Maui that have comparable densities of 64 units on less than 5 acres. What are the issues that have arisen with such a high density (particularly in an affordable housing environment)? And would it be possible to spread the project over a larger area by adding at least some of the adjoining vacant parcels to the immediate east of this proposed small 4.2 acre site?

viii. How will wastewater be handled? With a connection to the private Pukalani Treatment plant? If 'no', where will it go since the 4.2 acre site is fully occupied with housing?

ix. The diagram which was sent to us indicates a packed parking lot. Will fire trucks be able to easily get to the most distant houses if a fire were to occur at night when all the parking stalls would be full?

xii. The cover letter that we received made no mention of the type of units being made available. The EA should make clear the number of one, two and three bedroom units; the ownership vs. rental availability, etc.

xi. It is so difficult to get affordable housing built on Maui and particularly upcountry. What provision is being made for keeping these units affordable in perpetuity?

xii. Describe what happens when an owner or tenant wants to sell or leave. How will that unit be made available to another family meeting the income requirements?

xii. It needs to be made clear how the housing will be managed: at a County office? On-site? Who will be responsible? Will there be any kind of Homeowner's Association? Required? Permitted? or Encouraged?

4. Please do not let our long list if comments give you the impression that the Kula Community Association opposes this worthwhile project. We have been asked to give this early input into the planning process and hope to make this project a wonderful addition to our upcountry housing mix.

If you need to contact us, please email;

our KCA president, Shelley Maddigan shelley@kula.us
our Vice-President Bobbie Patnode bobbiepatnode@fastmail.fm
and Boardmember Dick Mayer dickmayer@earthlink.net cell 283-4376

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October 21, 2013

Ms. Shelley Maddigan, Chair
Kula Community Association
P.O. Box 417
Kula, Hawai'i 96790

Dear Ms. Maddigan:

Consultation for the Proposed Kulamalu Affordable Housing Draft EA
TMK (2) 2-3-066: 012, 013 and 014, Makawao District, Maui, Hawai'i

Thank you for your letter dated September 12, 2013, concerning the proposed project. We have prepared the following in response to your comments (your comments have been italicized for reference):

1. *The Kula Community Association is strongly in favor of a project that will provide more affordable homes in the upcountry district.*

Your support for affordable housing projects in the upcountry district is acknowledged.

2. *We believe that this location has several advantages: a) near Longs Pharmacy; b) close to the County's Kula bus route; c) near King Kekaulike High School; and d) in proximity to a large recreational ball field.*

We acknowledge your support of the proposed project's location due to its proximity to Longs Pharmacy, the County of Maui's bus route, King Kekaulike High School, and a large recreational ball field.

3. *We ask that the Environmental Assessment specifically consider the following:*

i. *The availability of water and whether it is proper to jump ahead of upcountry residents who have been waiting many years for a water-meter.*

The proposed project has three pre-existing water meters that were included in the original purchase of the properties. This eliminates the need to place the proposed project on the Upcountry water meter priority list. The Kulamalu Affordable Housing project is compliant with all the rules and regulations of the Department of Water Supply.

ii. *The interaction between this project and the large, proposed Hale Mahaolu Senior citizen project that will be built across the street and immediately in front of the main entrance to the affordable housing project. Discuss traffic issues for both projects on that street and where Aapueo Drive intersects with Kula Highway.*

We acknowledge your concerns regarding traffic near the proposed project and the intersection of 'A'apueo Parkway and Kula Highway. The Draft Environmental Assessment for the proposed Kulamalu Affordable Housing project will include a discussion of traffic impacts. The Kulamalu Subdivision was master planned to include roadways that possess a maximum density to accommodate for future development within the Subdivision. The proposed Kulamalu Affordable Housing project will therefore not increase traffic densities because they are accounted for in the Kulamalu Subdivision master plan.

The planning of the adjacent Hale Mahaolu Senior citizen project has not yet involved the publication of a Draft Environmental Assessment. Until the Hale Mahaolu Senior citizen project has released its design details it is not possible to comment on the project's specifications. However, traffic densities introduced by the Hale Mahaolu Senior citizen project will also be within the maximum density capacity provided by the Subdivision's existing roadways.

iii. *The potential for the County's "Maui Bus" (Kula bus route) to enter the Kulamalu project and to come even closer to this affordable housing project and to the adjacent Hale Mahaolu senior housing.*

The County of Maui, Department of Housing and Human Concerns, and the County of Maui Department of Transportation are currently working on establishing a bus route within the Kulamalu Subdivision. The Draft Environmental Assessment for the Kulamalu Affordable Housing will address bus routes near the project site.

iv. *Identification of which elementary school will be impacted and how impacted.*

According to the Department of Education (DOE), there is sufficient space in DOE schools that serve Pukalani to accommodate students who will live in the project.

v. *The ability of school busses to enter this project and safely pick up students, especially young ones. Will a bus shelter be provided in this windy and often rainy location?*

The proposed Kulamalu Affordable Housing project will not incorporate a bus stop. The County of Maui is currently looking into the possibility of providing one or more school bus pick up/drop off areas on peripheral roadways in order to mutually benefit the community within the Kulamalu Subdivision.

vi. *The EA should indicate the use of the three other parcels on this super-block. Will there be any kind of incompatibility or negative interaction (undesirable commercial activities, since these lots are zoned commercial)?*

The use of the other parcels on the subject property are currently unknown, they however are also located within the State Land Use "Urban" designation and the County of Maui's "County Business Town" district, whereby a mixture of residential, schools, and rural service/commercial centers are permissible uses.

vii. *Provide examples of existing housing projects on Maui that have comparable densities of 64 units on less than 5 acres. What are the issues that have arisen with such a high density (particularly in an affordable housing environment)? And would it be possible to spread the project over a larger area by adding at least some of the adjoining vacant parcels to the immediate east of this proposed small 4.2 acre site?*

We are not familiar with specific housing projects with comparable densities on Maui. However, many multi-family projects can be expected to have similar densities. Please note that earlier development plans proposed 85 market priced units on the same site. Since purchasing the property for affordable housing, the County has reduced the number of units to 64. Typical issues that may arise with higher density housing are demands on infrastructure and management of the completed project. Infrastructure for the Kulamalu Commercial Subdivision was designed to accommodate the cumulative development of all properties within the subdivision; therefore, no infrastructure problems are anticipated. The Department of Housing and Human Concerns will be responsible for property management and intends to contract with a private property manager with extensive experience in affordable housing. Consideration is also being given for a live-in property manager to ensure proper management 24/7.

Spreading the proposed project's boundaries beyond its 4.179 acres is infeasible due to topographical and financial constraints. The adjoining vacant parcels are not owned by the County of Maui.

viii. *How will wastewater be handled? With a connection to the private Pukalani Treatment plant? If 'no', where will it go since the 4.2 acre site is fully occupied with housing?*

Wastewater will be handled appropriately by a privately owned waste management company.

ix. *The diagram which was sent to us indicates a packed parking lot. Will fire trucks be able to easily get to the most distant houses if a fire were to occur at night when all the parking stalls would be full?*

The proposed project, as with all new projects, must comply with the County of Maui Fire Code which mandates specifications for ingress and egress for fire trucks, and that the path of fire trucks cannot be obstructed in any way. The proposed Kulamalu Affordable Housing project will comply with all of the Fire Protection Bureau's rules and regulations related to access and turning radii for fire trucks.

x. *The cover letter that we received made no mention of the type of units being made available. The EA should make clear the number of one, two and three bedroom units; the ownership vs. rental availability, etc.*

The Draft Environmental Assessment will identify the types of units that will be available in the Kulamalu Affordable Housing project.

xi. It is so difficult to get affordable housing built on Maui and particularly upcountry. What provision is being made for keeping these units affordable in perpetuity?

Under the County of Maui Code 3.35.010, County funded affordable housing projects must be protected and remain affordable.

xii. Describe what happens when an owner or tenant wants to sell or leave. How will that unit be made available to another family meeting the income requirements?

Kulamalu Affordable Housing units will consist of rental units only. Units at the proposed Kulamalu Affordable Housing project will be made available for rent to individuals who have successfully completed the housing application process. Tenants who meet the income criteria will be accepted on an as needed basis when there are vacant units available for rent.

xiii. It needs to be made clear how the housing will be managed: at a County office? On-site? Who will be responsible? Will there be any kind of Homeowner's Association? Required? Permitted? or Encouraged?

The proposed Kulamalu Affordable Housing project will be managed by a third party property manager with extensive experience in affordable housing management. The County of Maui, Department of Housing and Human Concerns is also considering having an on-site live-in property manager.

xiv. Please do not let our long list if comments give you the impression that the Kula Community Association opposes this worthwhile project. We have been asked to give this early input into the planning process and hope to make this project a wonderful addition to our upcountry housing mix.

We acknowledge your comments and appreciate your support for the proposed project.

Should you wish to provide further input to the proposed project, please contact the undersigned.

Very truly yours,

Chester Koga

Chester Koga, AICP
Project Coordinator

cc: Jo-Ann Ridao, Director; Alan Murata
Department of Housing and Human Concerns, County of Maui

Dick Mayer, Chair of Planning
Kula Community Association