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GOVERNOR OF HAWAII



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LAND
STATE PARKS

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

June 24, 2015

Office of Environmental Quality Control
Department of Health
235 S. Beretania Street, Room 702
Honolulu, Hawaii 96813

Ref: 13OD-219

RECEIVED
15 JUN 25 11:14
OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

Dear Director:

With this letter, the Department of Land and Natural Resources (DLNR) hereby transmits the Final Environmental Assessment and Finding of No Significant Impact (FEA-FONSI) for the Ho`ola Na Pua Residential Treatment Facility situated at TMK #(1) 5-8-001:051, in the Koolauloa District on the island of Oahu for publication in the next available edition of the Environmental Notice.

The Department of Land and Natural Resources has included copies of public comments and the corresponding responses from the applicant that were received during the 30-day public comment period on the draft environmental assessment and anticipated finding of no significant impact (DEA-AFONSI).

Enclosed is a completed OEQC Publication Form, two copies of the FEA-FONSI, an Adobe Acrobat 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 Barry Cheung of Land Division at (808) 587-0430, or the proponent consultant Mr. David Robichaux at (808) 368-5352.

Sincerely,


Suzanne D. Case
Chairperson

Enclosures:

- 2 Hard copies
- 1 CD-Rom copy

cc Applicant

**APPLICANT ACTIONS
SECTION 343-5(C), HRS
PUBLICATION FORM (JANUARY 2013 REVISION)**

Project Name: Ho'ola Nā Pua Residential Special Treatment Facility,
Island: Oahu
District: Koolauloa
TMK: (1) 5-8-001:051
Permits: Building and Conditional Use (major), SMA (minor)

Approving Agency: Department of Land and Natural Resources
1151 Punchbowl St. Room 220
Honolulu, HI 96813
Attn: Barry Cheung (808) 587-0419

Applicant: Ho'ola Nā Pua
58-130 Kamehameha Highway
Haleiwa, Hawai`i 96712

Attn: Jody Allione (808) 347-3174

Consultant: North Shore Consultants
2333 Kapiolani Blvd Suite 3017
Honolulu, HI 96826
Attn: Devin J. Robichaux (808) 368-5352

Status (check one only):

FEA-FONSI

Submit the approving 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.

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

Ho‘ola Nā Pua is a non-profit organization dedicated to providing female child victims of sex trafficking with a therapeutic home capable of addressing the unique needs of children who have been sexually exploited. The proposed action is for renovation of the former Crawford Convalescent Home on the North Shore of Oahu for use as a special treatment facility to address the needs of female children who have been sexually abused. The existing building is well suited for the purpose, but it has been heavily vandalized over the past 6 months and will require complete internal renovation. Ho‘ola Nā Pua will raise funds for construction and operation from both public and private sources. The facility will be the central location of the non-profit organization. In addition to internal renovations the site will be fenced and roof renovations will be completed. Architectural features of the building will be preserved. The property and its improvements are owned by the State of Hawaii and managed by the Department of Land and Natural Resources (DLNR). The requirement for an environmental assessment under HRS 343 is triggered by this use of State land, and DLNR is the approving agency for this action.

After reviewing this assessment and considering comments from agencies and interested parties, the approving agency has reached a finding of no significant impact.

Final Environmental Assessment Ho'ōla Nā Pua Residential Special Treatment Facility, Oahu, Hawai`i TMK # (1) 5-8-001:051



*Prepared for
State of Hawai`i
Department of Land and Natural Resources*

June 2015

Final Environmental Assessment (FEA)

Ho‘ola Nā Pua Residential Special Treatment Facility, Oahu, Hawai‘i

Approving Agency

State of Hawai‘i Department of Land and Natural Resources
1151 Punchbowl Street, Room 220
Honolulu, HI 96813

Applicant



58-130 Kamehameha Highway
Haleiwa, Hawai‘i 96712

Prepared by



NORTH SHORE CONSULTANTS, LLC
2333 Kapiolani Blvd. Suite 2111
Honolulu, HI 96823

PROJECT SUMMARY

PROJECT NAME: Ho‘ōla Nā Pua Residential Special Treatment Facility

APPLICANT/LESSOR: Ho‘ōla Nā Pua, Inc.
58-130 Kamehameha Highway
Haleiwa, Hawai`i 96712

PROJECT LOCATION: Waiale`e Ahupua`a, Waialua District, Oahu

TAX MAP KEY: (1) 5-8-001: 051

PROPERTY OWNERSHIP: State of Hawai`i Department of Land and Natural Resources

LOT AREA: 12.854 acres 559,920 s.f.

EXISTING USE: Vacant

PROPOSED USE: Residential Care facility.

STATE LAND USE: Agriculture

COUNTY ZONING: Agriculture District (Ag-2),

SPECIAL DISTRICT: Within the Special Management Area

ACTION REQUESTED: Use of State Lands

APPROVING AGENCY: State of Hawai`i Department of Land and Natural Resources

ANTICIPATED DETERMINATION: Finding of No Significant Impact (FONSI)

PERMITS REQUIRED Department of Health Certification, IWS, Building
Conditional Use Permit, SMA (minor)

AGENCIES CONSULTED: Department of Land and Natural Resources Land Division
US Fish and Wildlife Service
DLNR State Historic Preservation Division
Hawai`i Department of Health

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Appendix A: Comment letters and responses from agencies and interested parties

Final Environmental Assessment (FEA) Ho'ola Nā Pua Residential Special Treatment Facility

1.0 Introduction

The following section describes the proposed renovation of the former Crawford Convalescent Home, now vacant, to accommodate its new purpose as the central location of the non-profit organization Ho'ola Nā Pua. Ho'ola Nā Pua's mission is to provide female child victims of sex trafficking with a therapeutic home providing comprehensive services specific to the unique needs of children who have been sexually exploited.

Ho'ola Nā Pua has obtained a right of entry and intends to utilize State land leased from the State Department of Land and Natural Resources. Any project that uses state land and is not otherwise exempted is required to assess the impacts of the proposed action as required by Hawaii Administrative Rules (HAR) Chapter 11-200, and Hawai'i Revised Statutes (HRS) Chapter 343, called The Hawaii Environmental Protection Act (HEPA). HEPA encourages cooperation between federal and state agencies in the environmental review process; however, because there is no federal involvement the National Environmental Protection Act is not triggered.

This Environmental Assessment is prepared in conformance with the requirements of HAR Chapter 11-200, which contains 9 distinct triggers. Should any of the triggers be applied to the proposed action an Environmental Assessment (EA) or Environmental Impact Statement (EIS) will be required. Triggers are defined in the regulation as follows:

1. Use of public lands or funding...
2. Use of land in the State Conservation District...
3. Use within the Shoreline setback...
4. Use of any historic site of district...
5. Use within the Waikiki District...
6. Requires amendment to the General Plan...
7. Reclassification of Conservation district Lands...
8. Proposed helicopter facilities
9. Propose any:
 - (a) Wastewater facilities
 - (b) Waste-to Energy Facility
 - (c) Landfill.
 - (d) Oil refinery, or
 - (e) Power generating facility.

The proposed action will utilize public land and may secure state funding from one or more public sources. This EA is prepared to satisfy the requirements of HEPA contained in HAR 11-200 and HRS 343. This document is prepared in response to Trigger Number 1 because it will utilize public land.

Following receipt of comments from agencies and interested parties the proponent and the approving Agency have reached a finding of no significant impact (FONSI).

1.1 Project Location

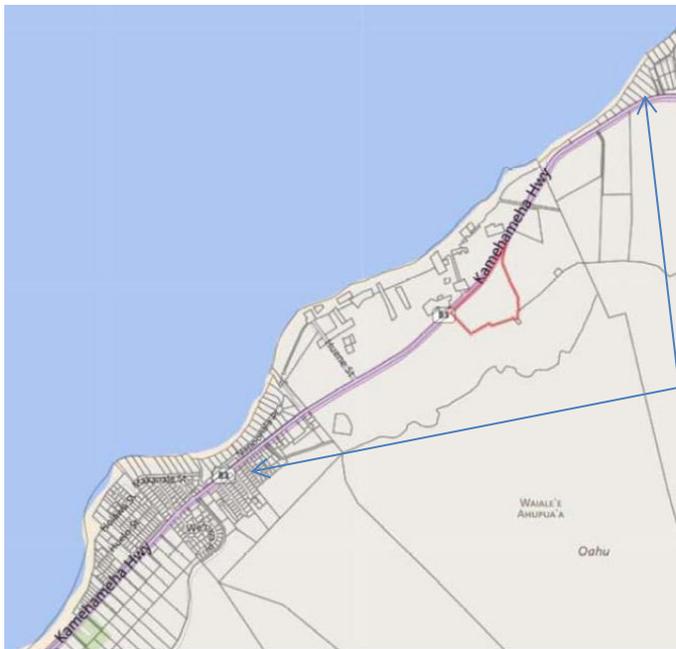
The project is located at 58-130 Kamehameha Highway on the North Shore of the Island of Oahu between the communities of Sunset Beach and Kahuku (Figure 1). The parcel is owned by the State of Hawaii Department of Land and Natural Resources. The parcel has been developed since the early 1900s and used by the Crawford Convalescent Home between 1954 and 2013. The site is identified as Tax Map Key: (1) 5-8-001:051.

The parcel covers 12.854 acres of land zoned for agriculture (Figure 2). It is bounded on the north by vacant land, on the south by the University of Hawaii Waiale'e Agriculture Experiment Station, on the east by Kamehameha Highway and the Pacific Ocean and west by steep land on the cliffs of the northern portion of the Island. Latitude and longitude are as follows:

Lat. 24°41.22' N Lon:-158° 1.32 W



Figure 1: The approximate location of the Ho'ola Na Pua Residential Special Treatment Facility Sunset Beach, Oahu, Hawai'i



The subject property is in the State agriculture District and the County agriculture Zone (Ag-2). It is located within the Special Management Area (SMA) due primarily to its proximity to the coastline. It is also within the revised Tsunami Inundation zone.

Residential Areas are located 3/4 mile to the northeast at Kawela Bay and 1/2 mile to the southwest at Sunset Beach

Figure 2: Parcel Map: Residential areas of Sunset Beach and Kawela Bay are seen.



Figure 3: Aerial Photograph of the subject property showing the 12.8 acre parcel and surroundings.

1.2 Proposed Action

The proposed action is to redevelop the existing facilities formerly known as the Crawford Convalescent Home into a modern and functional recovery center for teenage girls who have been victims of sex trafficking or related sexual abuse. Ho'ola Nā Pua will form a base of operations to promote statewide recognition of the impacts of the sex trade on its victims and the broader society which knowingly or unknowingly allows teenagers to be sexually abused. The Ho'ōla Nā Pua Residential Special Treatment Facility will be developed and operated by trained, certified, and paid professionals employed by a non-profit foundation. The facility will be operated as a twenty-four hour, therapeutic residence that will embrace an environment committed to restoration and healing of children who have been sexually trafficked and to enable them to become contributing members of our island communities. This residence must provide multiple therapeutic services including education, mental and physical care with multiple adjunct treatment modalities utilized.

Ho'ola Nā Pua will renovate the existing main building to accommodate the needs of the project. Internal renovations are expected to be extensive; however, the building exterior will be retained. Roof repairs will be consistent with existing materials and color schemes. One of the most noteworthy features of the property are the ruins of the dormitory from the Waiale'e Industrial School that was built in 1903 and abandoned around 1950. The ruins are currently unstable and unused. These will be maintained in their current state, and will not be used or occupied. The only other change in appearance will be the addition of a security fence surrounding the developed portion of the property. Specific improvements and changes to the project site are detailed below.

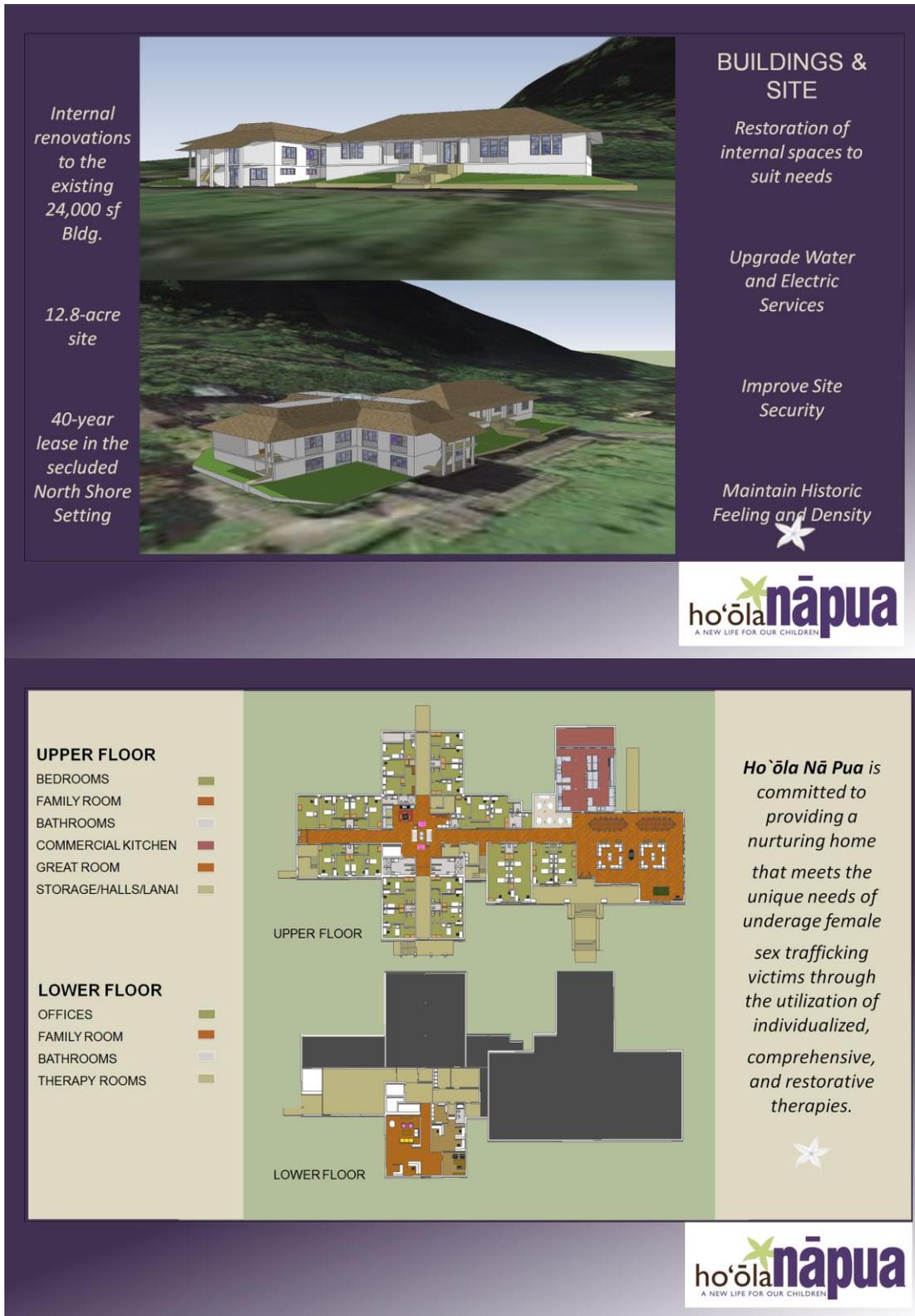


Figure 4: Artist's conception of the Exterior color and roof, interior layout showing upper and lower floor



Figure 5: Interior layout of bedrooms and group spaces



KITCHEN

A Commercial Grade Kitchen will be the center of a nurturing home-like environment.

Classes in food preparation will help our girls learn healthful life habits and home economics.

A Breakfast Café setting can help girls learn job skills and creates an upbeat mood.



ho'ola nāpua
A NEW LIFE FOR OUR CHILDREN



ADMINISTRATION

Offices
Admissions/Discharge
Records
Medical Care
Operations/Maintenance



THERAPY ROOMS

Classrooms
Counseling
Family Rooms



ho'ola nāpua
A NEW LIFE FOR OUR CHILDREN

Figure 6: Interior layout of kitchen and therapy rooms

1.3 Project Objectives

Ho'ōla Nā Pua's mission is to provide female child victims of sex trafficking with a therapeutic home providing comprehensive services specific to the unique needs of children who have been sexually exploited. The home is beyond a structure, building, or a program. It is a safe place where healing and new life can begin. The mission is to provide a therapeutic environment where hope is given and healing is experienced. The team of trauma trained advocates, mentors, and professionals are committed to the physical, mental, emotional and spiritual health and wellbeing of these girls. It will provide resources on a long-term basis for holistic health care, compassionate counseling, remedial education, and eventual reintegration as contributing members of their communities. Ho'ola Na Pua's volunteer teams also work to reduce sex trafficking in Hawaii through education, public outreach, legislative support, and fight child pornography and domestic child abuse.

The organization has several primary objectives:

1. Develop a rescue facility for abused girls: This proposed development is to operate a long term residential care facility to house female minors rescued from sex trafficking in Hawaii. The facility will be operated as a twenty-four hour, therapeutic residence that will embrace an environment committed to restoration and healing of children who have been sexually trafficked and to enable them to become contributing members of our island communities. This residence must provide multiple therapeutic services including education, mental and physical care with multiple adjunct treatment modalities utilized. The goal is to provide a culturally sensitive program suitable for Hawaii. A local program and clinical director will be hired to initiate the licensing process.
2. Outreach Services to locate sexually abused female minors: The facility will seek to increase the number of rescued children by maintaining a partnership with medical and human services providers including state and federal agencies and NGOs in order to identify and treat victims in an immediate compassionate and proactive manner to provide a short term and long term safe harbor for the survivors and ultimately reduce recidivism. Currently, hundreds of children are not being adequately screened and are often mislabeled or not identified as victims of sexual exploitation. They often continue within the system and their exploitation remains hidden. The goal is to work closely with Family Court to develop a state wide victim centered protocol beginning with initial identification and screening of children who have been sex trafficked and customizing a plan committed to healing and an extended period of restoration and intervention.
3. Increasing awareness of sex trafficking in Hawaii through adolescent and adult education will help to provide safeguards for threatened youth. Creating an interactive community outreach to organizations, churches, and the population at risk in order to provide ongoing information and debriefings on how to recognize and combat sex trafficking, root out its causes, protect its victims, and promote a prevalent attitude of "not on our islands". Educating and alerting our youth about the dangers of sex traffickers can help prevent some youth from becoming victims. With that purpose, we have created the Smart Courage Program for presentation to school systems and youth organizations. Over the past eighteen months, the program was delivered in over 55 middle and high school classrooms to over 3300 students.

4. Rebuke and penalize Demand: Support legislation that protects the victims and penalizes the pimps and solicitors. Develop an initiative to fight pornography and support efforts to rescue children suffering from domestic abuse that are prime candidates for sex traffickers recruiting efforts.

1.4 Program Description

Ho`Ola Nā Pua's state licensed facility will provide a comprehensive, holistic, individualized therapy plan for each resident who is placed within our facility. Safety is our primary concern working with this population. It is our mission to create a sanctuary that supports traumatized girls in crisis. Residents will be provided with a safe place to heal as their physical, emotional, psychological, psychosocial, spiritual, educational, and reintegration needs are met. Our goal is to prepare each resident for successful transition and reintegration back into the community. The core concepts of trauma informed care and gender responsiveness (relational, strengths based, and culturally competent) are foundational aspects of our program. Core principles of trauma informed care include: safety, trustworthiness, choice, collaboration, and empowerment.

This comprehensive program embraces the practice of Hawaiian values such as: Lokahi (unity and harmony), Mālama (caring), Hō ihi (respect), Ahonui (patience and enduring), Hilina i (trust), Huikala (forgiveness), and Aloha (love). The use of the Hawaiian culture and its values will be used in promoting a healthy recovery and restoration from severe trauma, which requires a comprehensive approach to healing.

The goal is to help each resident develop self-value, believe in themselves, achieve their goals and dreams, and embrace the value and meaning of their life by creating a trauma informed residential environment. All staff, mentors, and volunteers will utilize trauma informed gender specific approaches to working with this population. Site selection, staff selection, program content that reflects an understanding of the realities of the lives of girls and addresses and responds to their strengths and challenges are core to gender responsive services.

A trauma informed environment is characterized by the following:

1. Incorporates an understanding of the impact of violence and abuse on girls into all programs and services.
2. Establishes physical and emotional safety in order to prevent re-traumatization, an increase in eating disorders, self-harm, management problems, failure to engage in program services, relapse, recidivism and poor program outcomes.
3. Maintains an atmosphere that is respectful of girls and their need for safety, respect and acceptance.
4. Eliminates unnecessary triggers and identifies triggers for each individual.
5. Strives to maximize a girl's ability to make safe choices and exercise control over her life.
6. Creates a support network with healthy relationships and connections as core to this support system. One secure attachment creates the seed of resiliency.

In addition to creating a trauma informed environment, utilization of the TIER (Trauma Informed Effective Reinforcement) System for girls will be essential in the daily health, behavioral management and the healing process.

Consultation with local mental health and counseling experts has been a key component in planning the program for this home. The proponent has formed an alliance with Dr. George Rhoades, Director of the Ola Hou clinic in Honolulu. Dr. Rhoades is an internationally recognized leader in trauma therapy and is developing a program customized for Hawaii's sex trafficked survivors.

Dr. Rhoades is a long standing resident in the State of Hawaii, and a national and international expert in the arena of child sexual exploitation, trauma, PTSD, and dissociative disorders. He is providing clinical and program oversight for this home. Utilization of evidenced based treatment modalities and therapy plans are essential to a comprehensive program. Dr. Rhoades has a successful outpatient practice that he runs at the Ola Hou Clinic. He is constantly researching the use of the most current therapy modalities to provide his clients the best services possible. His extensive knowledge in treating trauma and having worked within the Hawaiian culture for decades is invaluable to the success of this home. Under the guidance of Dr. Rhoades, mental health assessments and qualitative studies will be an integral part in evaluating the home and treatment modalities.

Direct employees of the home will include: an in house therapist, social workers, executive director, facility administrator as well as a number of the line staff required to ensure the highest quality 24 hour care. All staff and volunteers will be carefully screened and vetted by to assure that caliber of personnel are competent and without any history of sexual violations or criminal activity.

In addition, interns from the Myron B. Thompson School of Social Work as well as selected doctoral students with trauma counseling and therapy focuses may be engaged. The priority will be to maintain a positive and productive relationship by collaborating with other service providers in meeting the comprehensive needs of this population. Under the direction of Dr. Rhoades, mental health research will be conducted to document the effectiveness of the program and to advance the field in understanding and treating those who are sexually trafficked. Agencies that could be involved in this research include The Pacific Survivor Center, Sex Assault Treatment Center, and Girls Court, as well as other service providers who are working under the Hawaii Anti Human trafficking task force. The applicant also plans to work closely with other community vocational groups to help with our land utilization and teachings of sustainability.

The following flow chart is a graphical description of the comprehensive program we will provide. Integrating group and individual therapy with adjunct therapies, along with mental and physical health care, educational needs and assessments, activities of daily living, spiritual healing, Hawaiian culture and values, sustainability projects, family reunification and therapy are all key components. Our goal is to provide the best practices available to equip the girls with the life skills, education, and coping skills needed for successful reintegration back into our community.

EXHIBIT

Ho'ola Nā Pua TREATMENT PROGRAM

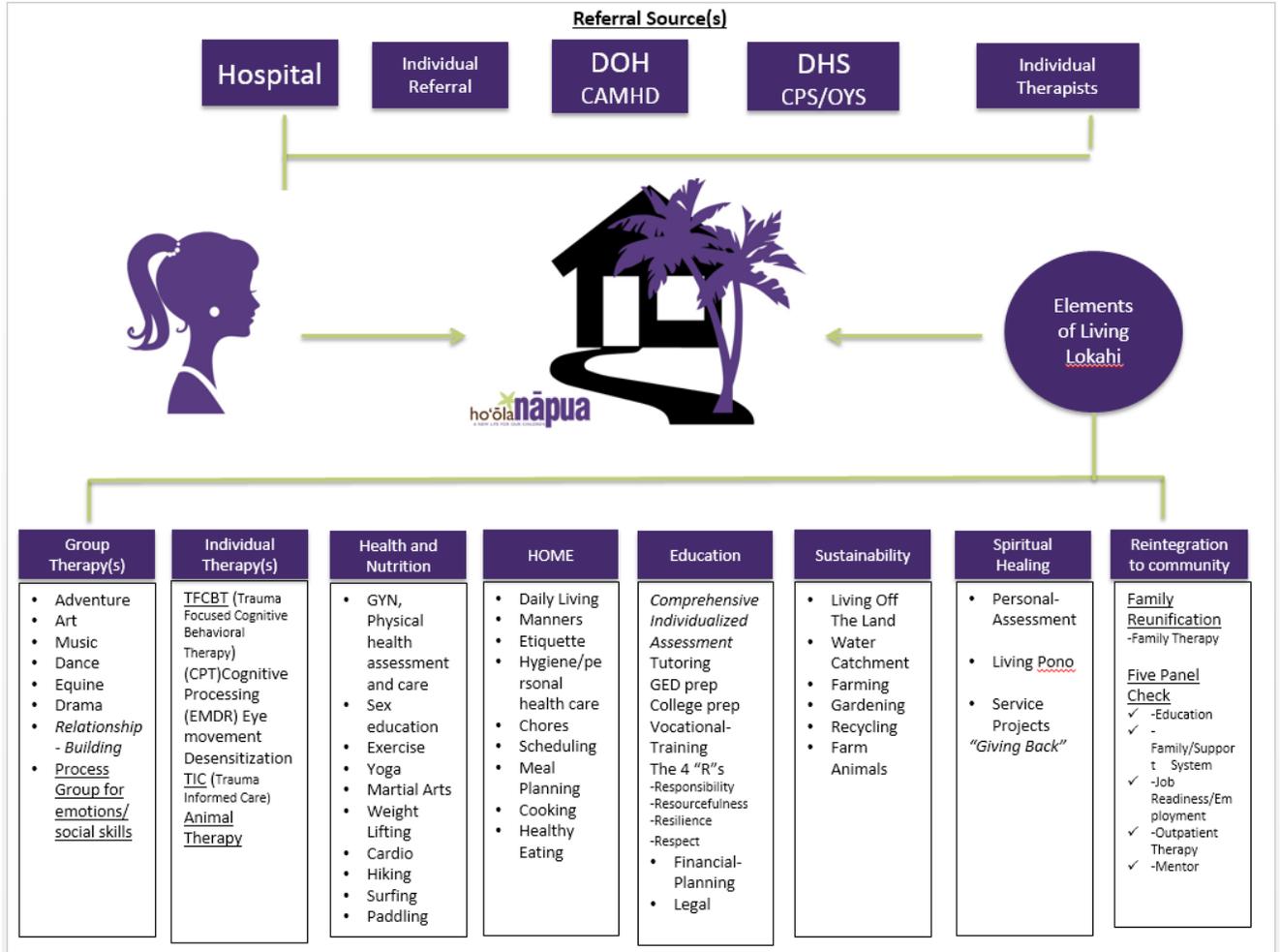


Figure 7: Ho'ola Nā Pua's approach to social wellbeing.

1.5 Project Schedule

Planning for a proposed Special Treatment Facility has been ongoing since 2012. Funds are being solicited with the goal of obtaining the needed funds to initiate construction 2015. Community interfacing has been ongoing since the effort was initiated. The focused public outreach has been underway since the DLNR awarded the right of entry in November 2014. In August 2014 the final steps for planning, permitting and design were initiated. This Environmental Assessment and the Conditional Use Permit are being prepared in mid-2015 in parallel with the application for a Certificate of Need that

will prompt the Special Treatment License application with the Department of Health. Building permits will be secured upon receipt of the initial license approval. Initial operations are expected to begin in April 2016. A milestone schedule is included in Figure 8.

ACTIVITY	START BASIS	TARGET COMPLETION	COMMENTS
Environmental Assessment	1/5/15	5/22/15	FONSI
County SUP	1/5/15	9/4/15	
Certificate of Need Filed	3/2/15	8/17/15	Notice to DOH to accept Special Treatment Program Application
Special Treatment Facility Conditional License Approved	8/18/15	2/1/16	Subject to Facility Compliance Review
Funding for Construction	1/15/15	1/15/16	Grants, Philanthropic Donations
Building Permits	9/15/15	1/18/16	
Construction Commences	1/19/16	12/19/16	
Commencement of Operations	1/9/17		Pending Final Building Compliance Approval and License issued

Figure 8: Proposed Project Milestones

1.6 Permits and Approvals

State and County permits that may be required are listed below:

Permit or Approval	Approving Agencies
Environmental Assessment	Department of Land and Natural Resources
Special Management Area (SMA)	Department of Planning and Permitting
Conditional Use Permit (CUP)	Department of Planning and Permitting
Individual Wastewater (Septic)	Department of Health
Medical and Psychiatric Care License	Department of Health

Discussions with the State Department of Health have begun. The Medical and Psychiatric Care License follows receipt of a Certificate of Need from the State Health Planning & Development Agency. An application for a Certificate of Need has been submitted and discussions with the Health Planning Agency indicate that it will be issued within the next few months. Licensing requirements include approval of management credentials and inspection and approval of the completed facility after the remodeling is completed. DOH cannot provide comments on the operating license at this time.

2.0. Environmental Setting, Anticipated Impacts, and Mitigation Measures

2.1 Existing Land Use

The subject property is currently unused. Approximately half of the 12.8 acres are mowed and maintained and the other half is undeveloped and overgrown with Kiawe, Haole Koa and other invasive species. The property contains the remains of several previous uses including the main building and support buildings for the Crawford Convalescent Home that was built in 1954 and closed in 2013. Crawford's Convalescent Home renovated the Main Building in the 1970s. It is structurally sound but internal spaces have been vandalized over the period since it has closed. A second building used for employee quarters has been identified for demolition by DLNR prior to occupancy by the proponent. A shell of the dormitory of the Waiale`e Industrial School remains on the property, but it has been abandoned since the early 1950s. Adjacent uses include single-family residences to the south-west and an empty lot to the north-east, which may be used for a charter school in the future. Kamehameha Highway is approximately 265 feet to the south at its closest point. The subject property is accessed by Kamehameha Highway. The nearest District Park is Waiale`e Beach Park located seaward (Makai) of Kamehameha Highway about 1000 feet from the main building on the property. The project site is located 1.5 miles north west of Sunset Beach. The nearest residential communities are approximately ½ mile south at Sunset Beach and 0.9 miles north at Kawela Bay. Property immediately surrounding the site is either undeveloped, vacant, agricultural or used by the University of Hawaii for agricultural research.

Impact and Mitigation

The proposed action will continue the land use for which the property has been developed. Its earliest use was as a reform school. Since the zoning regulations were adapted the facility has been classified as health services, and the buildings identified as group living facilities. The City and County continues to classify the proposed use as a group living facility and the activity as Health Services. These uses have never been subject to land use permits because they were in existence when the permitting system was adopted and therefore “grandfathered” into the system. Because the existing business has been closed for more than 12 months the proposed use is not continuous and will be subject to land use permits. A Conditional Use Permit (major) (CUP) will be required by the City and County as part of the development. Terms and conditions of the CUP will be intended to minimize the impacts of the proposed operations and the integrity of its operators to stick to the intended purpose. There will be no impacts to the inventory of agricultural land because the parcel has not been in agriculture since the 1940s. The land use patterns associated with the proposed action will be similar if not identical to the uses on the parcel for the past 60 years. As a result of the proposed action the uses will be permitted rather than grandfathered. This may be considered a positive impact associated with the proposed action.

2.2 Socioeconomic Characteristics

Waiale`e is near the boundary between the Pupukea and Kahuku Census Designated Places (CDP) As of the 2010 census, Pupukea (including the community of Sunset Beach) contained 4,250 people, 1,455 households, and 937 families. The population density was 1,250 people per square mile. The racial makeup of the CDP was 55.95% White, 14.56% Asian, 6.52% Pacific Islander, 1.18% from other races, and 20.89% from two or more races.

Over the same period Kahuku CDP contained 2,097 people, 509 households, and 401 families. The population density was 2,150 people per square mile. The racial makeup of the CDP was 11.06% White, 26.85% Asian, 27.28% Pacific Islander, 1.05% from other races, and 33.33% from two or more races.

Pupukea CDP contained 1,455 households out of which 32.8% had children under the age of 18 living with them, 10.3% had a female householder with no husband present. 3.4% had someone living alone who was 65 years of age or older. The average household size was 2.92 and the average family size was 3.35.

Kahuku CDP contained 509 households out of which 43.2% have children under the age of 18 living with them, 14.3% had a female householder with no husband present. 11.0% had someone living alone who was 65 years of age or older. The average household size was 3.96 and the average family size was 4.63.

In Pupukea 23.6% of the population is under the age of 18, and 7.3% were 65 years of age or older. The median age was 34 years. This compares with Kahuku where 35.4% of the population was under the age of 18, and 12.7% were 65 years of age or older. The median age was 28 years.

In Pupukea the median household income was \$56,146, and the per capita income for the CDP was \$25,682. About 11.4% of families and 15.2% of the population were below the poverty line (Wikipedia, 11/2011).

In Kahuku the median household income in the CDP was \$39,135, and the per capita income for the CDP was \$12,340. About 14.6% of the population and 11.8% of families were below the poverty line.

Many workers in this location commute to other places for employment. The primary source of employment in these communities is farming, and tourism related. Skilled and unskilled labor for the proposed facility could originate from either Pupukea or Kahuku.

2.3 Weather and Climate

The vicinity of the subject property typically has a warm, wet, and windy climate. Prevailing tradewinds arrive from the northeast. According to the National Weather Service Honolulu Office, over a period of 30 years, normal monthly high temperatures range from 79.1 degrees in January to a high of 86.7 degrees in August for an average of 82.9 degrees. Normal month low temperatures range from a low of

65.6 degrees in February and a high of 72.5 degrees in August for a monthly average of 68.9 degrees. Precipitation typically ranges from 0.70 inches in August to a high of 5.2 inches in January (Sunset Beach). Rainfall increases dramatically with uplift provided by the seaward cliffs, but the majority of that falls further inland than the subject property.

2.4 Topography, geology and soils

The project site is relatively flat, has been graded and cleared, and lies on a coastal plane. The project site and surrounding areas are relatively flat and devoid of any significant natural features. About 5 out of the 13 total acres are cleared; majority of cleared space covered in St. Augustine grass. Geology is volcanic soils interspersed with calcareous marine deposits.

76% of the project site is located on soils classified as Waialua silty clay (WkB, 3 to 8% slopes according to the *Soil Survey of Islands of Kaua'i, Oahu, Maui, Molokai, and Lanai, State of Hawai'i* by the U.S. Department of Agriculture Soil Conservation Service. There is no known evidence of hazardous materials, solid wastes or industrial land use that may suggest on-site contamination. More characteristics are described below.

WkB—Waialua silty clay, 3 to 8 percent slopes

Map Unit Setting

- *National map unit symbol:* hqjd
- *Elevation:* 10 to 100 feet
- *Mean annual precipitation:* 25 to 50 inches
- *Mean annual air temperature:* 72 to 75 degrees F
- *Frost-free period:* 365 days
- *Farmland classification:* Prime farmland if irrigated

Map Unit Composition

- *Waialua and similar soils:* 100 percent

Description of Waialua Setting

- *Landform:* Alluvial fans
- *Landform position (two-dimensional):* Footslope
- *Parent material:* Alluvium

Typical profile

- *H1 - 0 to 12 inches:* silty clay
- *H2 - 12 to 60 inches:* silty clay

Properties and qualities

- *Slope*: 3 to 8 percent
- *Depth to restrictive feature*: More than 80 inches
- *Natural drainage class*: Moderately well drained
- *Runoff class*: Low
- *Capacity of the most limiting layer to transmit water (Ksat)*: Moderately high (0.20 to 0.60 in/hr.)
- *Depth to water table*: More than 80 inches
- *Frequency of flooding*: None
- *Frequency of ponding*: None
- *Available water storage in profile*: Moderate (about 8.4 inches)

Interpretive groups

- *Land capability classification (irrigated)*: 2e
- *Land capability classification (nonirrigated)*: 3c
- *Hydrologic Soil Group*: C

Impact and Mitigation

This project will not require grading or grubbing. Water service pipes may be replaced as necessary requiring a small amount of trenching. NPDES permitting is not anticipated due to the lack of grading and grubbing. Because of the minimum disturbance and relatively flat topography, no impacts to local soils or runoff are anticipated.

2.5 Surface Water and Drainage

The subject property is approximately 800 feet from an unprotected coast of the Pacific Ocean on the North Shore of Oahu. Surface elevation of the site is gently sloped over the majority of the property. Elevations range from 15 feet to 78 feet above mean sea level. The intermittent Waiale`e stream forms north boundary of the property, and an ancient fishpond is located 380 west of the site on the seaward side of Kamehameha Highway. The coastal areas near the north point of Oahu are relatively arid near the coastline and getting wetter with distance inland as a result of the tradewind showers. The Waialua silty clay has a relatively high permeability, reducing the potential for runoff, particularly in the flat areas of the parcel. The area is subject to occasional winter storms that drop rainfall in quantities that are not absorbed by the ground. Runoff from the impervious surfaces are normally absorbed in the grassed and wild buffer areas on the parcel, but during heavy storms runoff would exit the site along Kamehameha highway and travel seaward to the areas now designated as Waiale`e Beach Park where soils consist primarily of sand. Run-on to the property is limited by the steep cliffs on the landward (mauka) side of the property.

According to *The Flood Insurance Rate Maps*, (DLNR, 2015) <http://gis.hawaiiinfip.org/FHAT/> the majority of project site is located in Zone X. Zone X is an area determined to be outside of the 0.2% annual chance floodplain. No base flood elevations or depths are shown within this zone. The undeveloped areas on the makai edge of the parcel are within the AE zone having a flood elevation of 15 feet.

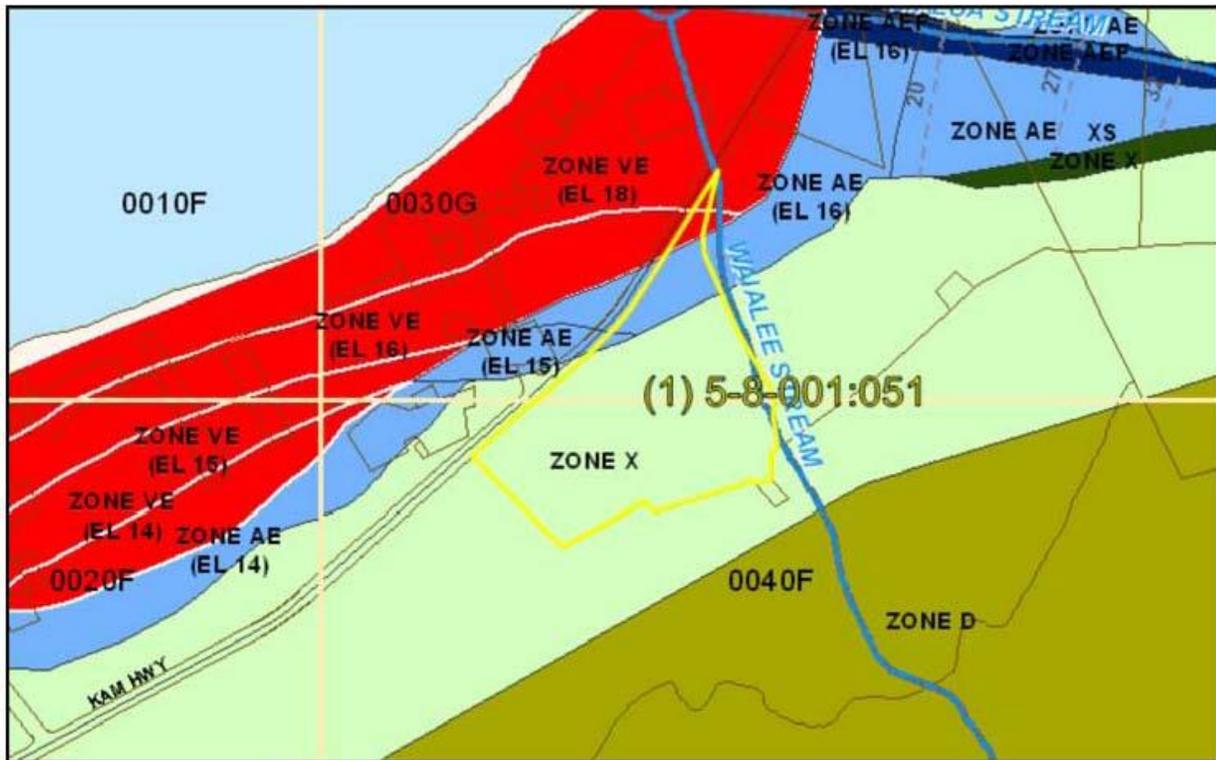


Figure 9: Flood insurance rate map of the project site.

The *Civil Defense Tsunami Inundation Map Panel 11* for Oahu indicates that the tsunami evacuation area does extend mauka of Kamehameha Highway and roughly corresponds to the portion of the parcel that is within the AE flood zone (NOAA Pacific Services Center, 2015). Zone AE indicates a 1% annual chance of being flooded as determined by FEMA detailed methods. AE is commonly called the 100-year flood zone. This flood zone carries some development restrictions and requirements. The AE portions of the property are not developed. The majority of the parcel is in Flood Zone X. Flood zone X has a less than 0.02% annual flood probability. In other words it is outside of the 500 year flood zone, which is normally considered safe. The existing structures are in Flood Zone X.

Impacts and Mitigation

The proposed action will not add to the impermeable surfaces of the parcel. In the rare instances when surface water runoff occurs it is very likely to be drained either overland to Waiale`e Beach Park where it will infiltrate in the sandy soils surrounding the shoreline, or drain to Waiale`e Stream. Surface disturbance during project construction is expected to be minimal because of the existing infrastructure

water and wastewater infrastructure. Best management practices and soil erosion controls will be used during landscaping changes, and with landscape maintenance.

2.6 Biological Resources.

In pre-contact times the sloping uplands at the Ho'ola Na Pua Residential Special Treatment Facility location would have been reforested with native 'ohi'a (*Metrosideros polymorpha*) and koa (*Acacia koa*) trees. The land with lower slope close to the coastline would be expected to have been colonized by native grasses, trees, and shrubs.

During post-contact times the area was heavily populated. A large number of *kuleana* still exist in the area, which indicates that the area was suitable for farming and fishing. In the late 1800s the area was acquired by the territorial government for use as a reform school, which encompassed the site and adjoining 700 acres. The School taught agriculture and later industrial arts. Lands were cleared and used for grazing and vegetable production. The subject property was plowed, burned, harvested and planted in continuous cycles for 50 years. These uses greatly reduced the numbers and overall diversity of native plants, and these were gradually replaced by increasing numbers of non-native agricultural and pasture plants. A number of tree species were planted along the edges of fields to serve as windbreaks. Other species deemed to be useful or ornamental were also planted in gulches and along ditches. Many of these have proliferated and some have become invasive.

Since 1954 the subject property has been landscaped with non-native grasses over approximately 50% of its area. The remainder has been allowed to go fallow, and is in the progression of colonizing species, almost exclusively invasive. The exception is the cliffs at the rear of the property which are too steep for use. Those areas may be visited by endemic Hawaiian birds including the Oahu Elepaio (*Chasiempis sandwichensis ibidis*), Apapane (*Himatione sanguinea*) and Amakihi (*Hemignathus virens*). Other species common to the area include northern cardinal (*Cardinalis cardinalis*), spotted dove (*Streptopelia chinensis*), red-vented bulbul (*Pycnonotus cafer*), Indian myna (*Acridotheres tristis*) and gray francolin (*Francolinus pondicerianus*). Feral pigs (*Sus scrofa*), Indian mongoose (*Herpestes javanicus*), rats (*Rattus rattus* or *Rattus norvegicus*), common mice (*mus musculus*), and cats (*Felis domesticus*) have spread throughout the area and have had a negative impact on native vegetation. They also are an important vector for the spread of weed species throughout the forests.

Impacts and Mitigation

The proposed action will add to the amount of human presence in the area; however, that area has been populated throughout recorded history. The use as a therapeutic residential treatment facility for girls will be a low impact use in terms of impacts on transient special status species. No impacts are noted and no mitigation is required to support biological resources.

2.7. Archaeological, Cultural and Historic Resources

The subject property is located in within the Waiale`e Ahupua`a in the Ko`olouloa District of Oahu. The project site is adjacent to an area described by Cultural Surveys Hawaii, Inc. (February 2014) as part of the City's proposed development of Waiale`e Beach Park.

According to Hammett et. Al. quoting Clark 1946, the place name Waiale`e means rippling or stirring waters. At one time people on shore this area could see freshwater bubbling up in small fountains on the shallow reef at low tide. The freshwater upwelling may have influenced Hawaiians in naming the area. The small island offshore is called Kuka`imanini meaning a parade of Manini fish. Cultural Surveys Hawaii (2014) reports that within the Waiale`e ahupuaa a major concentration of Hawaiian habitation and activity was focused within the coastal flats just behind the coastline. In this coastal area there was a freshwater spring that would have provided water for drinking, irrigation of lo`i and a brackish water environment for Kalou Pond.

Archaeological sites were identified near the coastal flats makai of the subject property. These include:

Kalou Pond (Site 50-80-01-257) is located west of the project site near the Waiale`e Beach Park. Kalou Pond is an ancient fishpond categorized as a loko wai (altered by humans) first reported by McAllister, 1933 and later by Kikuchi, 1973). The pond is fed by an underground spring on its south end. There are two demigods associated with this pond. Malackahana and Laleikawai formed the pond where a fish hook fell and dug into the ground (Kikuchi, 1973). In addition recent research has identified cultural layers within the beach area makai of the subject property.

The 1832 census documented the population of Oahu at 29,755, with 2,891 of those residing in the Koolauloa District. Although there are no specific numbers for Waiale`e, Cultural Surveys Hawaii speculates that the area immediately makai of the subject property may have been a fairly dense local population focused on taro farming, and marine resources exploitation. This is supported by records from the Organic Act of 1850 which awarded lands to individuals. Forty-four kuleanas were recorded within the Waiale`e Ahupuaa; many of them are located makai of Kamehameha Highway near the project site. The land court awards near the ocean were primarily for Auwai and loi, while upland sites were identified as banana, dryland taro, sweet potato, sugarcane and Koa. No land court awards are located within the subject property.

By 1853 the population of Koolulua was reduced to 1,345 persons, less than half of what it was thirty years earlier (Schmidt, 1977). Based on the 44 LCA and 21 recorded house sites, it seems that Waiale`e was one of the population centers in the District. No major changes were noted until the Kahuku Sugar Mill was started in 1890 and the Oahu Railway and Land Company built rail service to Kahuku in 1899. These two developments would have a significant impact on the lifestyle and economics of the area. The immediate impact was increased population to work in the sugar fields. The 1900 census showed 2,372 people in the District, with most of the increase associated with plantation workers. This trend increased through 1970 when the District population exceeded 10,000.

The first known use of the project site was upon construction of the Waialeale Training School for Boys in 1903. The facility is also referred to on maps and the Waialeale Industrial School. The Territorial Legislature of 1864 authorized an act to establish an industrial and reformatory school *“for the care and education of helpless and neglected children, and also for the reformation of juvenile offenders. The objective of said industrial and reformatory schools shall be the detention, management education, employment reformation and maintenance of such children as shall be committed thereto as orphans, vagrants, truants living an idle or dissolute life, or duly convicted of any crime or misdemeanor.”* Authorized in 1899, the school was not started until 1901 when the land was deeded to the Department of Education. The Waiale`e school was built to replace an older one in Kapalama. In May 1902 boys were moved from town into Waialeale.

Originally the School consisted of 650 acres construction continued in stages through 1934 when 42 separate buildings were in operation. It contained all of the lands between the cliffs and the shoreline. The shoreline extended for approximately one mile. Cultural Surveys Hawaii states that it was a major entity for change in the area. In the 1930s there were between 150 and 175 “inmates” confined to the school. Training centered on agriculture and animal husbandry (Territorial Planning Board, 1939). Consistent with the prison –type circumstances there are reports of dark cells build below ground, ball and chain restraints, shackles and leg irons, and lashings were common place. An article in the Honolulu Record (September 3, 1953) notes that 70 percent of the inmates at the Oahu Prison come from the Waialeale training School, which is supposedly a correction and rehabilitation home. Many of the inmates asking in their early youth to be transferred to the jail rather than withstand the brutality of the administration staff at the boys school. The inmates and staff totaled between 200 and 250 persons for much of the schools history. The facility produced cattle, hogs, vegetables and poi for other institutions and themselves.

The school was in use until 1950 when it was closed and the remaining inmates were transferred to windward Oahu. Shortly thereafter the Crawford Convalescent Home utilized some of the land and buildings but constructed a new building in 1954. In 1960 the University of Hawaii took control of other School buildings and established the Waiale`e Agricultural Experiment Station. The Oahu Railway ceased operation in 1947 and Kahuku Sugar closed its door in 1971. Presently the Agricultural Experiment Station only uses pastures on the makai side of Kamehameha Highway.

In 1950 Fredrick Crawford retired from the territorial hospital system and acquired the rights to the property. The main building of Crawford’s Convalescent Home was completed in 1953 and the facility was opened in 1954. Crawford’s Convalescent Home served residents who were elderly and required medical assistance until 2010 when low occupancy and rising costs forced it out of business. Subsequent to closing the leasees maintained a presence until June 2014. Since that time it has been vacant and has been subject to vandalism and theft.

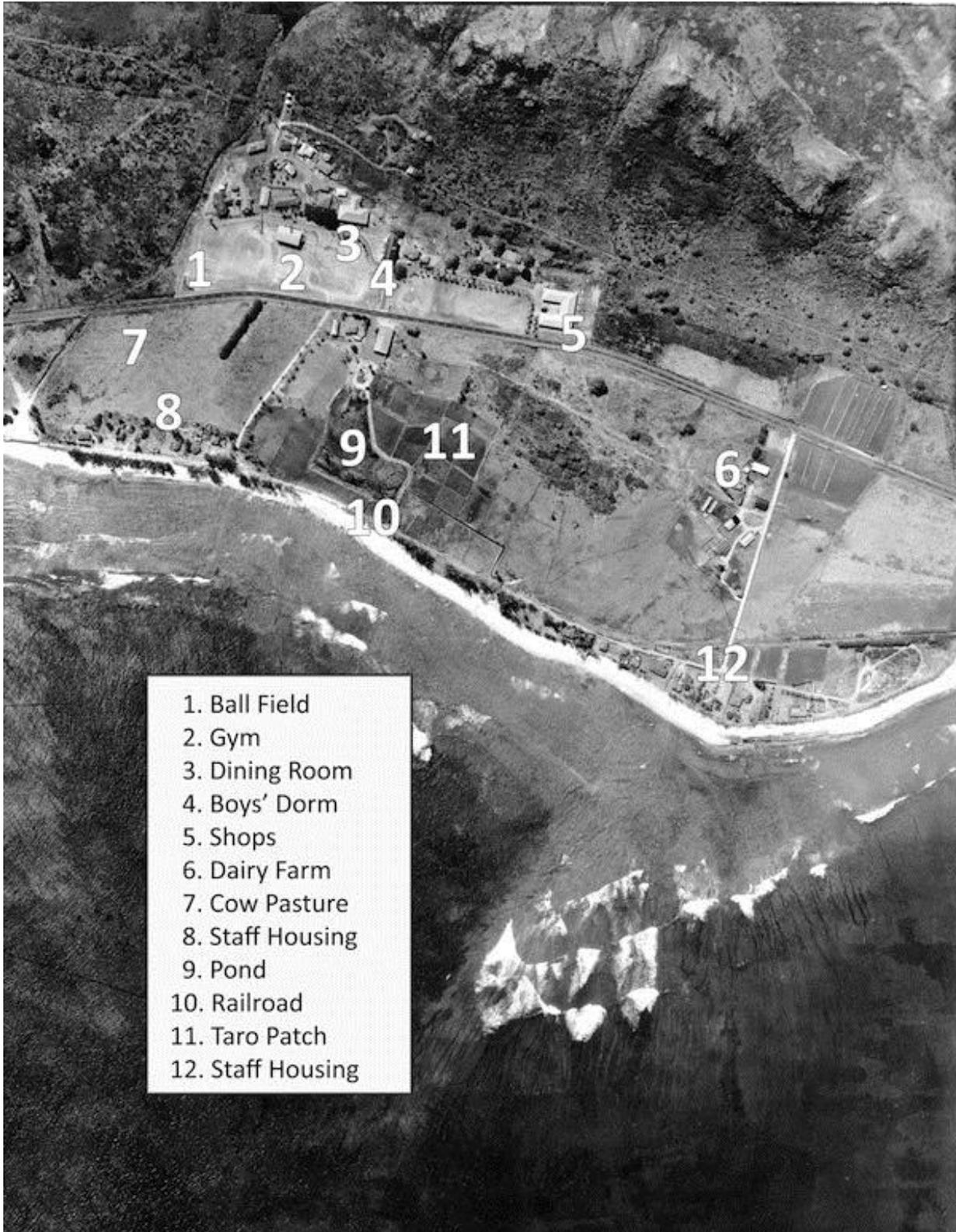


Figure 10: A 1949 aerial photograph of the Waiale`e Industrial School campus. Courtesy of Stafford Ames-Morse, <http://www.ghostowns.com/states/hi/waialeee.html>.

Figure 11: Boys Dormitory in 1935, Bottom: Dormitory ruins in 2014.

Impacts and Mitigation

The proposed action includes demolition and renovation of the internal spaces for the former Crawford’s building. The only exterior construction will be to replace the roof with similar roofing materials. No grading, grubbing and minimal trenching is expected. The appearance and all external design details of the 1953 convalescent home will be retained. Impacts to the character and function of the primary structure will be temporary and limited to those associated with construction. No mitigation measures are required to address impacts associated with the Convalescent home. The former boys dormitory from the Waiale`e Training School is the only historical structure on the property. It will not be demolished or renovated. A permanent fence will be placed around the structure for health and safety reasons. A security fence will also be installed around the 5 acres of developed area of the parcel. Impacts associated with the addition of security fences include restricted visibility of the property. These will be mitigated using vegetative buffers which hide the fence. Landscaping and development plans have been reviewed by the State Historic Preservation Division (SHPD) of the Department of Land and Natural Resources (DLNR), which concluded that no historic properties would be affected by the proposed action. Their recommendations are included in Appendix A, and will be followed throughout the project development.





Figure 12: Street view of the Crawford's Convalescent Home around 2007. The abandoned dormitory is just off of this photo to the right side. The buildings shown here will be renovated and used by the proponent Ho'ola Nā Pua

Although subsurface disturbance is expected to be minimal there is some chance that evidence of burials may be discovered. If ancient burials are found, a Burial Treatment Plan will be prepared for inadvertent burial discoveries encountered during the monitoring of the project. In addition, consultation with appropriate ethnic groups, the procedures outlined in Chapter 6E-43 shall be followed. It will be necessary for the Treatment Plan to be prepared after consultation with Native Hawaiians, such as the Oahu Island Burial Council and the Office of Hawaiian Affairs.

A report documenting the monitoring and burial treatment work would be submitted to the Division for review and approval.

The proposed action is not expected to result in significant negative impacts on historic sites, archaeological artifacts or Native Hawaiian cultural practices. Alternatively, the proposed action is intended to provide valuable services to the community, resulting in positive impacts for all of the residents of Hawaii.

2.8 Scenic and Visual Resources

The proposed action will not result in the loss of open space. The proposed action will restore the former Convalescent home to operating condition and retain the historical building remnants on the property. Landscape and general maintenance will be improved over its current condition. Views of the sea cliffs rising behind the existing structures will not be occluded. The primary visual resources are toward the ocean in this vicinity. As the subject property is on the land side of Kamehameha highway coastal vistas are not impacted. Scenic views of the ruins of the Waiale`e Industrial School will be maintained. The architecture provides a distinct statement of early 20th century grandeur, but the ruins also serve as a stern reminder of a darker chapter in our history to many resident of the area.

2.9 Traffic Impacts

The Facility is designed to serve a 24 hour care service for female child victims of sex trafficking with a therapeutic home providing comprehensive services specific to the unique needs of children who have been sexually exploited. The maximum density of clients is 32, however, the most likely scenario ranges between 12 and 20 patients at any time. The staff loading is 1 staff person per each 3 patients. The staff during the daytime shift is 5 for the 12 patient scenario, and 12 for the maximum density. Because the facility operates 24/7 the totals staff is larger, but distributed over 24 hours. Patients do not drive in and out, but may have visitors. The quantity of new traffic in peak drive time morning and evening is estimated to be less than 15 vehicles. Specialists and visitors are not expected to be concentrated during peak traffic times. The increase in traffic is well below the levels that trigger traffic studies.

Impact and Mitigation

There will be a slight increase in traffic during construction. This traffic is expected to be temporary and also below the level that is expected to affect the level of service on Kamehameha Highway.

2.10 Noise Environment

Sources of noise within the project area are typical of rural environments. The project site has no close neighbors, and is not expected to generate noise during operations that are beyond those associated with residential uses. Noise sources near the subject property will be primarily from vehicular traffic along Kamehameha Highway and lawn/landscape equipment used on the project site. Construction related noise will be minimal through most of the renovations, but will be discernable during roof repair activities. The area also experiences noise from natural sources. Strong tradewinds concentrate near the north point of Oahu. They are consistently in the 20 mph range, and higher on elevated ground. The North Shore of Oahu is famous for surf. During winter months surf is readily heard for more than one mile inland from the coast.

Impact and Mitigation

Short-term and temporary noise impacts related to construction are to be expected. These will be mitigated through limiting construction to standard business hours, and best management practices. Construction contractors will utilize best management practices to minimize the noise impact during construction operations. The subject property has few neighbors and no one within 500 feet. Noise impacts are expected to be minimal and restricted to short term construction-related noise. These will be much less than the regulatory limit of 70 Db at the property line and will not require mitigation.

2.11. Air Quality

The proposed project is on the north side of Oahu in an agricultural area. Air quality is generally quite good due to the predominant northeasterly trade winds that cross no land south of the Kamchatka Peninsula or the Aleutian islands. The low levels of regulated pollutants all originate from traffic along Kamehameha Highway. Agricultural activities may generate dust. There are upwind sheep grazing areas across Kamehameha Highway of the project site, but these activities are not intensive and are not expected to impact operations at the project site.

The proposed action is not expected to be a source of regulated air pollution during its construction or operation. Minor dust and odors may be generated during site construction.

Impacts and Mitigation

Dust and possible diesel odors would be short term temporary impacts associated with construction. A building materials inspection for hazardous building materials will be performed in advance of demolition and construction. Lead-based paint and asbestos-containing materials will be handled according to best management practices and properly disposed in advance of general construction and demolition. The majority of construction and demolition will be indoors and therefore less of an impact on neighboring properties. Worker safety from dust in enclosed spaces is the primary concern. This hazard will be mitigated by construction and demolition contractors for the benefit of their employees.

2.12. Public Utilities and Infrastructure

The subject property is currently served by an existing County water system. The demand for County water is not expected to change significantly because of the limited demands associated with the subject property. Water conservation measures are likely to be part of the permit requirements.

Electricity is provided by Hawaiian Electric Company. The demand for power will not significantly increase over the former use by Crawford Convalescent Home. The capacity for generation and transmission of power is adequate to meet the additional demand proposed for the Facility.

Telephone service is supplied by Hawaiian Telephone via above ground transmission lines.

No municipal wastewater collection systems are nearby. Wastewater is disposed in individual wastewater systems (IWS) which by law now consist of septic tanks and leach fields.

Solid waste will be generated by the facility on a scale that is roughly equivalent to its former use. Solid waste will be collected by a private waste contractor and disposed in the County waste disposal system at H-Power or Waimanalo Gulch Sanitary Landfill.

Impact and Mitigation

The proposed action is not expected to significantly affect the capacity of any public utilities or infrastructure due to the limited size and scope of operations.

2.13. Public Services

The Kahuku Fire Station provides fire protection service to the project area as well as first response emergency medical service. The station is located 56-460 Kamehameha Highway in Kahuku. Response time to the project site is approximately seven minutes. Back up response will be provided by the Sunset Beach Fire Station at the intersection of Kamehameha Highway and Pupukea Road. Ambulance service is provided by American Medical Response (AMR) which will provide emergency services first to Kahuku Medical Center and secondly to Wahiawa General Hospital. Police service is provided by the Honolulu Police Department Kahuku station, which is collocated with the Kahuku Fire Station. Response time to the site by the beat patrol is approximately five to ten minutes.

Impact and Mitigation

The proposed action is a service center for non-residents. Its construction and operation will not significantly affect the demand for police, fire, or ambulance services. Due to its nature the facility will form close contacts with public services and comply with recommendations provided. Other public services including parks, recreational facilities and schools will not be affected by the proposed action.

3.0 Alternatives to the Proposed Action

Alternate locations have been explored by the applicant since 2012. Alternatives could include other programs that serve the same or similar needs and other locations for the proposed action program.

In the State of Hawaii there are organizations that provide various forms of outpatient services and treatment to our target population however, weekly contact in an outpatient setting is not enough to keep child victims of sexual exploitation safe nor does it adequately address their psychological condition. There are currently no long-term care beds for females ages 11 through 18 recovering from a life of sexual exploitation in the State of Hawai`i.

Ho`ola Nā Pua is a start-up organization and therefore we have only provided consultation to other organizations placing sexually exploited children. The list below is reflective of the feedback we have received from various organizations seeking to place sexually trafficked girls:

- Foster Care/Therapeutic Foster Care: These placements are not always ideal for the following reasons –
 - Trauma bonds (Stockholm Syndrome) formed with their traffickers resulting in them returning to their trafficker to be re-victimized.
 - Foster family's fears – foster families voiced valid fears that the traffickers/pimps will track down the youth to the foster home and place the youth, themselves, and their family in danger. In addition, foster families also fear the girl will make false allegations against males in the home, behave provocatively towards others in the home, attempt to split the parents and/or other family members, and/or try to recruit other children in the home to engage in commercial sexual exploitation.
 - Running away – foster families are not equipped to monitor the youth 24/7 and therefore this population often runs away while the family sleeps.
 - Schooling – Placing victims of sexual exploitation in public school is dangerous for various reasons which include, but are not limited to: stigma from those who know of their trafficking history, the possibility of recruiting others into sexual exploitation, provocative behaviors or dress, poor boundaries, poor social skills resulting in frequent fights, the traffickers ability to track down the victim, and poor concentration due to trauma symptoms.
 - Minimal therapeutic intervention – When in outpatient settings, child victims do not have access to intensive therapy and routinely only receive therapy on a weekly basis.
- Locked Facilities (Detention Home, Hawaii Youth Correctional Facility, locked psychiatric inpatient treatment): were not ideal for this population as they are not criminals and therefore to treat them as such is in direct opposition of federal law. In addition, these facilities are not equipped to provide the intensive sexual trafficking survivor specific therapy essential to a survivors healing process.
- Returning to Family Homes: In addition to running into the same issues seen with the foster homes, returning a youth to their family home may be unsuccessful due to -
 - Dysfunctional families – family dysfunction is a well-established antecedent to a youth being sexually trafficked. Returning youths to their dysfunctional home has proven to cause additional problems as the dysfunction still exists and is now compounded by the youth's trafficking experience and resulting trauma.

- Familial Trafficking – familial trafficking is when a family member sells a child to a recruiter, pimp, or anyone for sexual purposes in exchange for drugs, money, or monetary goods. Victims of familial trafficking often do not report familial trafficking due to family loyalty or fear of not being believed resulting in a large number of cases going undocumented.

- Placing girls in specific programs on the mainland is not ideal as it gives the youth the impression that they have done something wrong and therefore must leave the comfort of the islands they call home. In addition, many youth miss their families, face discrimination, and/or experience trouble assimilating into these programs and as a result run away placing them in great danger of being re-trafficked, or in serious danger from the fast paced cities they are too naive to navigate.

Although, not all attempts at the above placements have turned out poorly it can be definitively stated that even those who remained in placement would have benefited from a therapeutic long-term residential facility located on our islands which designed specifically to address the needs of children who have been sexually exploited.

3.1 Other Programs with Common Objectives

The State Office of Community Services (OCS) within the Department of Labor and Industrial Relations offers services that including assistance to human sex traffic victims. These services include underage girls. By necessity its emphasis is on refugee and immigrant populations. OCS operates three programs for refugees that are also open to international victims of human trafficking. They are (1) the Refugee Social Services Program, (2) the Refugee Cash and Medical Assistance Program, and (3) a grant from the U.S. Department of Justice, to provide support services to domestic and foreign victims of human labor and sex trafficking in urban Honolulu. The program for Human Labor and Sex-Trafficking Victims is offered only in the City and County of Honolulu at present due to funding limitations. Its objective is to promote interagency coordination in the provision of services to sex and labor trafficked victims residing in the City and County of Honolulu.

OCS contracts with three private non-profit agencies to provide services to immigrants and sex/labor trafficking victims. The primary source of support for refugee sex traffic victims is the Susanna Wesley Community Center (SWCC). SWCC has a program coordinator and case management staff to provide direct victim assistance and coordination of services. They work with local law enforcement to identify potential victims, to provide eligibility assessments for the victims; arrange and coordinates appropriate sheltering of the victim; and develop a transition plan to ameliorate the victim's specific challenges, including immigration and documentation issues. A second group supported by OCS is the Pacific Survivor Center (PSC). PSC provides physical, mental health services, and dental examination and medical treatment of the client population. There are a number of other well managed and dedicated

organizations providing support to victims of human trafficking and sexual abuse. These organizations (in alphabetical order) include:

Catholic Charities Hawaii (CCH). CCH provides interpretation (oral) and translation (written) language services, refugee resettlement, citizenship assistance and classes, and English language classes to immigrants and refugees. Catholic Charities Hawaii also provides services for refugees who already have ties to persons in Hawaii, through part of a grant made to the United States Conference of Catholic Bishops.

Hawaii Immigrant Justice Center (HIJC). HIJC provides legal services and representation to immigrants for cases involving domestic violence and sexual assault, human trafficking, asylum, crime victims, family unification/reunification, child protection advocacy, citizenship, deportation defense and case management services for foreign victims of human trafficking.

Pacific Alliance to Stop Slavery (PASS). PASS provides mentorship services and advocacy for survivors of human trafficking, education and training on the identification of victims of human-trafficking and public awareness and prevention education for the greater community.

Pacific Gateway Center (PGC). PGC provides interpretation (oral) and translation (written) language services, case management, counseling, basic computer skills, job preparation, training and placement, technical assistance, micro lending, and affordable housing to immigrants, refugees and foreign victims of human trafficking.

Pacific Survivor Center (PSC). PSC provides medical and psychological intervention, referral to social services for the survivors of human trafficking and torture, and advocacy and training for the community.

Susannah Wesley Community Center (SWCC). SWCC which provides case management, counseling, crisis intervention and interpretation and translation services to immigrants and victims of human trafficking.

The Ho'ola Nā Pua Residential Special Treatment Facility will work in concert with all who have similar objectives, and anticipates close coordination with the organizations referenced above. The proposed action will offer comprehensive services to a specific subset of victims of human trafficking and sexual abuse. Its scope will be limited to serving the increasing number of female children subjected to sexual abuse and requiring long-term comprehensive support to return to society.

3.2 Other Locations

The Residential Special Treatment Facility could provide the desired services from a different location or different configuration; however, after consultation with agencies providing funding and guidelines the current configuration is deemed appropriate for the scope of services proposed. The location is

appropriate because it is located in a relatively isolated area away from the vice and temptations associated with urban areas from which many of the patients originate.

3.2.1 Hauula, Windward Oahu Location

Ho`ola Nā Pua investigated a similar site in the upland areas of Hau`ula, in Windward Oahu. The site was formerly designated as a residential treatment retreat for children with autism. The site was well suited for the purpose and contained one main house and 9 smaller houses that could have been utilized with minor renovation. Lease negotiations with the owner were protracted and difficult and the offer was ultimately withdrawn.

3.2.2 Vacant Land

Vacant land was examined on Kauai and Hawaii Island. New construction requires a considerable amount of time and expense that could be avoided through leasing an existing facility. Concerns also arose over the availability of professional staff to operate the facility, including therapists, trauma physicians, social workers, probation officers and medical staff. Outer Island land was rejected as an alternative because of the time, expense and potential operating difficulty.

3.3 No Action Alternative

Hawaii is a prime target for sex traffickers who capitalize on male leisure and business travelers, and military personnel. As the demand for sexual services increases in Hawaii, so does the number of victims, specifically the malleable, underage victims. Young girls in Hawaii are bought and sold. They are ordered online, purchased in massage parlors, and put out on the street to generate business for sex traffickers.

While it is currently not possible to know exactly how many children are being sold for sex in Hawaii, a University of Pennsylvania study on national child sexual exploitation estimated that nearly 300,000 youth in the United States alone were at risk of being sexually exploited for commercial uses.¹ This is a conservative estimate. Due to the hidden nature of the crime, the statistics do not reflect the magnitude of the domestic minor sex trafficking problem.

Approximately 100-200 children are reported missing every month in Hawaii. Runaway children are the most vulnerable. Studies show that 85 percent of victims of prostitution have suffered sexual abuse as children, often at home, which is why they have fled to the streets.² Once on the streets, sex-offenders and sexual predators exploit these children's desire for love, encouragement and shelter, deceiving, intimidating or forcing them into prostitution.

¹ Allen, Ernie. National Center for Missing and Exploited Children remarks for the Congressional Human Trafficking Caucus. 7/21/2009. http://www.missingkids.com/missingkids/servlet/NewsEventServlet?LanguageCountry=en_US&PageId=4079 (Accessed 11/4/11)

² Bagley, C and Young, L "Juvenile Prostitution and child sexual abuse: a controlled study," Canadian Journal of Community Mental Health, Vol 6: 5-26, 1987. <http://cjc.mh.metapress.com/app/home/contribution.asp?referrer=parent&backto=issue,1,7;journal,51,62;linkingpublicationresults,1:120150,1> (Accessed 11/4/11)

Shared Hope International, an organization dedicated to the eradication of sex trafficking through legislation, gave Hawaii a D grade for not enacting laws to protect child victims of sex trafficking because of a significant lack of services providing short and long-term shelter for children in Hawaii. Currently there are no programs or facilities specifically for child-victims of trafficking and sexual exploitation. Hawaii's lacks of resources forces vulnerable youth back out onto the streets. Instead of being helped, they are being prosecuted, thrown in juvenile detention and vilified. The proposed action meets the demand for restoring the hope and civility of lost children.

The no-action alternative is not acceptable.

4.0 Relationship to Plans, Codes and Ordinances

4.1 United States

An important tool in managing refugees and foreign sex-trafficking victims is the Trafficking Victims Protection Act of 2000 (TVPA), which is administered by the Federal Office of Refugee Resettlement (ORR). ORR evaluates whether individual adults may be certified as victims of severe forms of trafficking. Individuals who are certified may be eligible for benefits and services under the Refugee Social Services Program and the Refugee Cash and Medical Assistance Program. ORR reviews whether the individual has been subjected to a severe form of trafficking, which means:

- Sex trafficking: in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- Labor trafficking: The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

Child victims of trafficking (under the age of 18) do not need to be certified in order to receive services and benefits. ORR will issue a letter stating that a child is a victim of a severe form of trafficking and is therefore eligible for benefits. Access to these services may be obtained through the State Office of Community Services (OCS), or any of their providers.

The PROTECT (Prosecutorial Remedies and Other Tools to End the Exploitation of Children Today) Act of 2003 requires grants for transitional housing for child victims of sexual assault. The Attorney General, acting in consultation with the Director of the Violence Against Women Office of the Department of Justice awards grants to administer this and other programs to meet this need.

This program assists those who are homeless, or in need of transitional housing or other housing assistance, as a result of fleeing a situation of domestic violence and for whom emergency shelter services or other crisis intervention services are unavailable or insufficient.

Grants are awarded for:

- Short-term housing assistance, including rental or utilities payments assistance and assistance with related expenses such as payment of security deposits and other costs incidental to relocation to transitional housing for persons previously described, and
- Support services designed to enable a minor, an adult, or a dependent of such minor or adult, who is fleeing a situation of domestic violence to locate and secure permanent housing; and integrate into a community by providing that minor, adult, or dependent with services, such as transportation, counseling, child care services, case management, employment counseling, and other assistance.

This project is intended to address the needs established under these federal programs, and is consistent with their goals and objectives.

4.2 State of Hawai`i

In July 2013, Neil Abercrombie signed the State of Hawaii Act 246 (<http://satchawaii.com/get-involved-public-policy-2013.aspx>) which amends the definition of child abuse, neglect, and harm contained in state human services and family court codes to include child victims of human trafficking, ensuring that such children receive proper legal, medical, and social support.

The State of Hawai`i also passed SB 979, which requires the office of youth services to coordinate a five-year safe place for youth pilot program to establish a network of safe places where youth in crisis can access safety and services. It establishes the position of safe places for youth program coordinator and allows youth in crisis under 18 years of age to consent to services in the safe places program under certain circumstances.

The State Office of Community Services (OCS) assists Hawaii's low-income, immigrant and refugee populations to overcome and alleviate workforce barriers to economic self-sufficiency via an array of community-based programs and services. OCS primarily contracts and administers program services on behalf of the State and Federal governments. While the majority of these programs target immigrants, domestic sex-trafficking victims are also eligible.

HRS 226 "The Hawaii State Planning Act" was originally prepared in 1978. The purpose of this chapter was to prepare the Hawaii State Plan which serves as a guide for the future long-range development of the State; identify the goals, objectives, policies, and priorities for the State. One of the themes on which the State Plan is based is:

Community or social well-being is a value that encompasses many things. In essence, it refers to healthy social, economic, and physical environments that benefit the community as a whole. A sense of social responsibility, of caring for others and for the well-being of our community and of participating in social and political life, are important aspects of this concept. It further implies the aloha spirit--attitudes of tolerance, respect, cooperation and unselfish giving, within which Hawaii's society can progress.

The Hawaii State Plan was further divided into 12 functional plans that addressed the priority subjects. The State Health Functional Plan was prepared in 1989, but the objectives contained in these plans are still quite relevant.

Objective 3 is to Improve access to Health Care for special populations.

Although sex trafficking victims are not specifically referenced, the objective is clearly supported by the proposed action

The Coastal Zone Management Act (CZMA) ensures preservation of Hawaii's coastal resources. Coastal Zone Management requirements are addressed in HRS 205A-2, which defines the entire State as being within the Coastal Zone. Of the 11 CZM initiatives the majority apply to coastal resources. Drainage flows to the north and enters the wetland areas within Waiale'e Beach Park. The proposed project includes minimal grading if any that is required to support installation of a security fence. Fencing activities will be conducted using best management practices to reduce stormwater runoff and sedimentation of nearshore areas. Cumulative and secondary impacts associated with stormwater and coastal non-point source pollution will be entirely mitigated. In addition the community employs low maintenance landscaping techniques that do not rely on fertilizers. Best management practices are adopted by Facility maintenance staff to reduce runoff.

The remaining initiatives of the CZMA are consistent with or not applicable to the proposed action.

4.3 City and County of Honolulu

The County General Plan was prepared in 1999 and updated in 2002. The General Plan contains provision to support the proposed action including:

Objective A: To prevent and control crime and maintain public order.

- *Policy 1: Provide a safe environment for residents and visitors on Oahu.*
- *Policy 2: Establish and maintain programs to encourage public cooperation in the prevention and solution of crimes.*
- *Policy 6: Seek the help of State and Federal law- enforcement agencies to curtail the activities of organized crime syndicates on Oahu, and*
- *Policy 9: Encourage the improvement of rehabilitation programs and facilities for criminals and juvenile offenders.*

5.0 Growth-Inducing Factors, Secondary and Cumulative Impacts

Growth inducing changes were considered positive impacts many years ago in most areas; however, many residents of our state no longer consider growth a goal to be sought after. Some developments do not have significant impacts in their construction or operation, but because of their demand may they may change the price of real estate, impact privacy, or change the character of a neighborhood. Growth inducing factors such as installation of a mass transit system, or opening of a Wal-Mart may create significant impacts due only to their growth inducing characteristics.

A secondary or indirect impact is an impact that is caused by the proposed action but is removed in time or space from the project.

Cumulative impacts may be defined as impacts on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes the action (Council on Environmental Quality, 1997). For example, the impacts associated with one condominium may not be as significant as those associated with 15.

The proposed action is intended to provide shelter to relocated sexually abused girls. Under these circumstances the proposed action does not create growth in the area. Positive secondary impacts may include increase employment or income the region, and positive benefits accruing to the patients of the facility. A positive cumulative impact could be considered the general capacity improvement resulting from reincorporating victims of sex trafficking into society.

5.1. Irreversible and Irretrievable Commitment of Resources

Implementation of the proposed project will result in an irreversible and irretrievable commitment of resources including public land, energy, and labor. Materials used for new construction may have salvage value; however, it is unlikely that such efforts will be cost-effective. The expenditure of these resources is offset by gains in construction related wages, increased tax base, secondary and tertiary spending.

5.2. Adverse Impacts Which Cannot be Avoided

Adverse impacts associated with the proposed action that cannot be avoided are related to short-term construction impacts including noise, dust and construction-related traffic. These impacts can be minimized by sound construction practices, Best Management Practices (BMPs), adherence to applicable construction regulations as prescribed by the Department of Health, and coordination with applicable County agencies.

6.0 Determination

The Hawai'i Administrative Rules Chapter 11-200(12) defines significance. If a proposed action is expected to have significant impacts, a full Environmental Impact Statement would be necessary. If the proposed action does not result in "significant" impacts the proponent is required to prepare an Environmental Assessment and Finding of No Significant Impacts (FONSI).

6.1 Definition of Significance

HAR 11-200 (12): In determining whether an action may have a significant effect on the environment, the agency shall consider every phase of a proposed action, the expected consequences, both primary and secondary, and the cumulative as well as the short-term and long-term effects of the action. In most instances, an action shall be determined to have a significant effect on the environment if it:

- *Involves an irrevocable commitment to the loss or destruction of any natural or cultural resource.*

The proposed action will occupy a parcel of land that has been in similar use for over 100 years. Cultural practices will not be disturbed and the historical structure on the property will be preserved.

- *Curtails the range of beneficial uses of the environment.*

The proposed project is an appropriate use that will benefit the community and is consistent with the surrounding land-use. The environment was not well served if the property remains abandoned, but upon completion of the proposed action it will provide access to needed social services.

- *Conflicts with the State's long-term goals or guidelines as expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders.*

The purpose of chapter 344 is to establish a state policy which will encourage productive and enjoyable harmony between people and their environment, promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of humanity, and enrich the understanding of the ecological systems and natural resources important to the people of Hawai'i. The proposed action supports the objectives of Chapter 344, by providing capacity building services to the residents of Hawaii.

- *Substantially affects the economic or social welfare of the community or State.*

The proposed action will have a positive contribution to the welfare and economy of the community and State by recovering the victims of slavery and sexual abuse.

- *Substantially affects public health.*

The proposed action will have a positive impact on public health.

- *Involves substantial or adverse secondary impacts, such as population changes or effects on public facilities.*

The proposed action will benefit the community. It is not expected to create substantial population changes and secondary impacts are negligible.

- *Involves a substantial degradation of environmental quality.*

\The proposed action will not degrade environmental quality with exception of short-term temporary impacts associated with noise and dust during construction. These impacts will be mitigated through best management practices imposed upon the construction contractor.

- *Is individually limited but cumulatively has a considerable effect upon the environment or involves a commitment for larger actions.*

The proposed action is not part of a larger action, and its cumulative impacts may be limited to improved economic potential of its beneficiaries.

- *Substantially affects rare, threatened or endangered species, or their habitats.*

According to comments from the US Fish and Wildlife Service, the proposed action will not affect any rare, threatened or endangered species, or critical habitat.

- *Detrimentially affect air or water quality or ambient noise levels.*

Short-term temporary impacts on air quality and noise may occur during construction, but will be mitigated by Best Management Practices imposed on the construction contractor.

- *Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach erosion prone area, geologically hazardous land, estuary, fresh water, or coastal waters.*

Although portions of the parcel are located within the AE food zone and tsunami evacuation zone, the developed portions are not located in any of the high risk areas listed above, and will not have an impact on an environmentally sensitive area.

- *Substantially affects scenic vistas and view planes identified in County or State plans or studies.*

The proposed action will not affect scenic vistas or view planes near the project.

- *Require substantial energy consumption.*

The project will use fossil fueled equipment during construction, and increase electrical energy consumption during operation. These increases are expected to be typical of previous demand at the site, and are not expected to impact the area power demand for fossil fuels or line power.

6.2 Finding of No Significant Impact

After consultation with agencies and interested parties responding to the Draft Environmental Assessment the applicant and the Hawaii Department of Land and Natural Resources (Approving Agency) have reached a Finding of No Significant Impact (FONSI) for the proposed action.

7.0 Consulted Parties and Preparers

7.1 Public Input Received During Preparation of the Draft and Final EA

During preparation of the Draft Environmental Assessment the applicant contacted the following agencies for preliminary consultation:

DLNR Land Division (Approving Agency)
DLNR State Historic Preservation Division
Department of Health, (Child & Adolescent Mental Health Division)
State Health Planning & Development Agency
US Fish and Wildlife Service Pacific Field Office

Comments on the DEA were obtained from:

Hawaii Department of Health radiological and Indoor Air Quality Branch
City and County of Honolulu Department of Planning and Permitting
Hawaii Department of Land and Natural Resources, and
Hawaii Office of Planning
North Shore Neighborhood Board (#27)
Sunset Beach Community Association
State Historic Preservation Division, DLNR

These agencies and community groups provided meaningful and relevant comments which were subsequently used to modify the Environmental Assessment. Copies of these comments and proponents response to those comments are found in Appendix A.

Ho`Ola NaPua attended the March meeting of the Sunset Beach Community Association to present the plan for redevelopment. As a result of that presentation the SBCA prepared a letter stating their unanimous support for the project (Appendix A).

Two separate groups applied for a lease of the subject property, and testified at the July 25, 2014 meeting of the State Land Board. BLNR encouraged Ho`ola NaPua to continue with the subject property but the North Shore Charter School contested the decision stating that the School was a better use of the site. DLNR suggested the North School Charter School organization to explore the feasibility of leasing the adjacent parcel (TMK # 5-8-001:053). In November 2015, the NS Charter School retracted its contest and began to pursue a lease on an adjacent parcel. The DLNR executed the Right of Entry for Ho`ola Na Pua on October 31, 2014. The two groups met on February 23rd in Haleiwa and agreed to cooperate. Members of the Charter School organization are also active in the Sunset Beach Community association and were present at the meeting where the Association unanimously endorsed the proposed action.

A public hearing was held at the March 24, 2015 meeting of the North Shore Neighborhood Board to introduce the proposed action to the public and request support from the Neighborhood Board. This meeting is also necessary and sufficient to support the Conditional Use Permit Application to be submitted subsequent to the completion of the Environmental Assessment. The North Shore Neighborhood Board also endorsed the project with their unanimous support (Appendix A).

7.2 Preparers

The Final Environmental Assessment was prepared by North Shore Consultants, LLC, Devin J. Robichaux, and Patricia Paulino, Project Managers. The work could not have been completed in an accurate or timely manner without substantial assistance from the following persons:

Dr. Bob Rechtman, Ph.D., President ASM Affiliates
Ms. Ana Broverman State Historic Preservation Division, DLNR
Ms. Jessica Munoz, Ho'Ōla Nā Pua
Ms. Jody Allione, Ho'Ōla Nā Pua
Mr. David Robichaux, North Shore Consultants

Appendix A

Comment letters and responses from agencies and interested parties:

Hawaii Department of Health radiological and Indoor Air Quality Branch
City and County of Honolulu Department of Planning and Permitting
Hawaii Department of Land and Natural Resources, and
Hawaii Office of Planning
North Shore Neighborhood Board (#27)
Sunset Beach Community Association
DLNR State Historic Preservation Division

DAVID Y. IGE
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:

March 27, 2015

Mr. Carty S. Chang
Board of Land and Natural Resources
Commission on Water Resource Management
P.O. Box 621
Honolulu, HI 96809

Dear Mr. Chang:

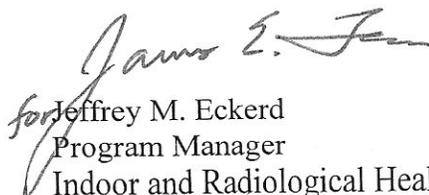
This correspondence is in response to your request for comments to the Draft Environmental Assessment for Ho'ola Na Pua Residential Treatment Facility, TMK: (1) 5-8-001:051, in the Koolauloa District, Oahu.

Project activities shall comply with the following Administrative Rules of the Department of Health:

- Chapter 11-41 Lead-Based Paint Activities
- Chapter 11-46 Community Noise Control
- Chapter 11-501 Asbestos Requirements
- Chapter 11-503 Fees for Asbestos Removal & Certification
- Chapter 11-504 Asbestos Abatement Certification Program

Should you have any questions, please contact me at (808) 586-4701.

Sincerely,


for Jeffrey M. Eckerd
Program Manager
Indoor and Radiological Health Branch

C: Jody Allione, Ho'ola Na Pua
Devin J. Robichaux, North Shore Consultants ✓



North Shore Consultants, LLC

Mr. Jeffery M. Eckerd, Program Manager
Indoor and Radiological Health Branch
Hawaii Department of Health
P.O. Box 3378
Honolulu, HI 96801

Dear Mr. Eckerd:

Comments Received on the Ho'ōla Nā Pua Residential Special Treatment Facility

Ho'ōla Nā Pua wishes to thank you for your review and comments on the Draft Environmental Assessment for the proposed redevelopment of the Residential Special Treatment Facility. These comments are valuable considerations in our long term planning and design. The project activities will comply with lead based paint, community noise, asbestos, and other administrative rules of the Department of Health.

We look forward to continuing to work together to protect and serve the needs of abused women.

Sincerely,

North Shore Consultants, LLC

Devin J. Robichaux, Project Manager
2091 Round Top Drive
Honolulu, HI 96822

(808) 637-8030 office
(808) 368-5352 cell
robichaud001@hawaii.rr.com

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honolulu.gov • CITY WEB SITE: www.honolulu.gov

KIRK CALDWELL
MAYOR



GEORGE I. ATTA, FAICP
DIRECTOR

ARTHUR D. CHALLACOMBE
DEPUTY DIRECTOR
2015/ELOG-528(PL)

April 14, 2015

Mr. David M. Robichaux, Principal
North Shore Consultants, LLC
2091 Round Top Drive
Honolulu, Hawaii 96822

Dear Mr. Robichaux:

SUBJECT: Request for Comments on Draft Environmental Assessment
Proposed Use of State Lands for Hoola Na Pua Residential
Special Treatment Facility
Haleiwa, Waialeale, Kaneohe, Oahu
Tax Map Key: 5-8-1: 51

Thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for the Hoola Na Pua Residential Special Treatment Facility. We offer the following comments:

1. The 12.854-acre site is in the AG-2 General Agricultural District. The facility would be considered a group living facility (GLF), which is a permitted use within the AG-2 General Agricultural District with a approved Conditional Use Permit (Major).
2. The site is also within the Special Management Area (SMA). The proposed security fence to be constructed around the facility will require an SMA permit.
3. The addition of outdoor therapy facilities in Figure 4 on Page 5 is not described in Section 1.2, "Proposed Actions". The addition should to be addressed in the Final EA and may require an SMP. Please be advised that if the development cost exceeds \$500,000, a "Major" SMA will be required.

If you should have any questions, please contact Pat Lee of our staff at 768-8019 or at plee@honolulu.gov.

Very truly yours,


for George I. Atta, FAICP
Director



North Shore Consultants, LLC

Mr. George I. Atta, FAICP Director
Honolulu, Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, HI 96813

Dear Mr. Atta:

Comments Received on the DEA Ho'ōla Nā Pua Residential Special Treatment Facility

Ho'ōla Nā Pua wishes to thank you for your review and comments on the Draft Environmental Assessment for the proposed redevelopment of the Crawford Convalescent Home to the Residential Special Treatment Facility. These comments are valuable considerations in our long term planning and design. We acknowledge that a group living facility is a permitted use within the general agricultural district, and we are preparing a Conditional Use Permit (Major) at this time. A Special Management Area application was submitted to your department on May 11, 2015 and is currently in review. Renovations covered under SMA are limited to a security fence, the value of which is approximately \$120,000; therefore, an SMA (Minor) permit is appropriate. There will be no outdoor therapy facilities. Figure 4, Page 5, has been revised.

We look forward to continuing to work together to protect and serve the needs abused girls in Hawaii.

Sincerely,



North Shore Consultants, LLC

Devin J. Robichaux, Project Manager
2091 Round Top Drive
Honolulu, HI 96822

(808) 637-8030 office
(808) 368-5352 cell
robichaud001@hawaii.rr.com

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 20, 2015

CARTY S. CHANG
INTERIM CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

W. ROY HARDY
ACTING 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

North Shore Consultants, LLC
David M. Robichaux, Principal
2091 Round Top Dr.
Honolulu, HI 96822

via email: robichaud001@hawaii.rr.com

Dear Mr. Robichaux,

SUBJECT: Draft Environmental Assessment, Ho'ola Na Pua Residential Special Treatment Facility, Oahu, Hawaii

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

At this time, enclosed are comments from (1) Land Division – Oahu District; (2) Office of Conservation and Coastal Lands; (3) Division of Forestry & Wildlife; and (4) Engineering Division. No other comments were received as of our suspense date. Should you have any questions, please feel free to call Supervising Land Agent Steve Molmen at 587-0439. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell Y. Tsuji", written over a horizontal line.

Russell Y. Tsuji
Land Administrator

Enclosure(s)

C: DLNR, Land Division
Attn: Barry Cheung
Email to: Barry.W.Cheung@hawaii.gov

Office of Environmental Quality Control
Email to: oeqchawaii@doh.hawaii.gov

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

March 19, 2015

MEMORANDUM

CARTY S. CHANG
INTERIM CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DANIEL S. QUINN
INTERIM FIRST DEPUTY

W. ROY HARDY
ACTING 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

TO:

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Draft Environmental Assessment, Ho'ola Na Pua Residential Special Treatment Facility, Oahu, Hawaii

LOCATION:

Oahu, Hawaii; TMK # (1) 5-8-001:051

APPLICANT:

Ho'ola Na Pua, Inc. by its consultant North Shore Consultants, LLC

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document which can be found here:

1. Go to: <https://sp01.ld.dlnr.hawaii.gov/LD>
2. Login: Username: LD\Visitor Password: 0pa\$\$word0 (first and last characters are zeros)
3. Click on: Requests for Comments. Click on the subject file "Draft Environmental Assessment, Ho'ola Na Pua Residential Special Treatment Facility, Oahu, Hawaii", then click on "Files" and "Download a copy". (Any issues accessing the document should be directed to Jonathan Real, Applications/Systems Analyst at 587-0427 or Jonathan.C.Real@hawaii.gov)

Please submit any comments by **April 17, 2015**. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

- We have no objections.
- We have no comments.*
- Comments are attached.

Signed: Barry Chung
Print Name: Barry Chung
Date: 3/30/15

* Upon the outcome of the EA process, Land Division will submit a request to the Board regarding the issuance of a direct lease for this project.

DAVID Y. IGE
GOVERNOR OF HAWAII



ZONING?



RECEIVED
OFFICE OF CONSERVATION
AND COASTAL LANDS

2015 MAR 20 P 3:21

DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

CARTY S. CHANG
INTERIM CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DANIEL S. QUINN
INTERIM FIRST DEPUTY

W. ROY HARDY
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
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HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

March 19, 2015

MEMORANDUM

TO:

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Draft Environmental Assessment, Ho'ola Na Pua Residential Special Treatment Facility, Oahu, Hawaii

LOCATION:

Oahu, Hawaii; TMK # (1) 5-8-001:051

APPLICANT:

Ho'ola Na Pua, Inc. by its consultant North Shore Consultants, LLC

RECEIVED
LAND DIVISION
2015 MAR 30 AM 10:58
DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document which can be found here:

1. Go to: <https://sp01.ld.dlnr.hawaii.gov/LD>
2. Login: Username: LD\Visitor Password: 0pa\$\$word0 (first and last characters are zeros)
3. Click on: Requests for Comments. Click on the subject file "Draft Environmental Assessment, Ho'ola Na Pua Residential Special Treatment Facility, Oahu, Hawaii", then click on "Files" and "Download a copy". (Any issues accessing the document should be directed to Jonathan Real, Applications/Systems Analyst at 587-0427 or Jonathan.C.Real@hawaii.gov)

Please submit any comments by **April 17, 2015**. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *[Signature]*
Print Name: Jonathan Real
Date: 3/30/15

NOT in conservation District

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

March 19, 2015

MEMORANDUM

CARTY S. CHANG
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BOARD OF LAND AND NATURAL RESOURCES
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LAND
STATE PARKS

TO:

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation

RECEIVED
LAND DIVISION
2015 MAR 27 PM 2:54
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Draft Environmental Assessment, Ho'ola Na Pua Residential Special Treatment Facility, Oahu, Hawaii

LOCATION:

Oahu, Hawaii; TMK # (1) 5-8-001:051

APPLICANT:

Ho'ola Na Pua, Inc. by its consultant North Shore Consultants, LLC

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document which can be found here:

1. Go to: <https://sp01.ld.dlnr.hawaii.gov/LD>
2. Login: Username: LD\Visitor Password: 0pa\$\$word0 (first and last characters are zeros)
3. Click on: Requests for Comments. Click on the subject file "Draft Environmental Assessment, Ho'ola Na Pua Residential Special Treatment Facility, Oahu, Hawaii", then click on "Files" and "Download a copy". (Any issues accessing the document should be directed to Jonathan Real, Applications/Systems Analyst at 587-0427 or Jonathan.C.Real@hawaii.gov)

Please submit any comments by **April 17, 2015**. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: 
Print Name: LISA HADDOCK
Date: 3/27/15

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

March 19, 2015

MEMORANDUM

CARTY S. CHANG
INTERIM CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DANIEL S. QUINN
INTERIM FIRST DEPUTY

W. ROY HARDY
ACTING 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

TO: *FR*

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division**
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation

15 MAR 20 PM 2:54 ENGINEERING RECEIVED LAND DIVISION
2015 APR 13 PM 3:08
DEPT. OF LAND & NATURAL RESOURCES STATE OF HAWAII

FROM: *P*

Russell Y. Tsuji, Land Administrator
Draft Environmental Assessment, Ho'ola Na Pua Residential Special Treatment Facility, Oahu, Hawaii

LOCATION: Oahu, Hawaii; TMK # (1) 5-8-001:051

APPLICANT: Ho'ola Na Pua, Inc. by its consultant North Shore Consultants, LLC

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Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *Chris Jakobczyk*
Print Name: **Carty S. Chang, Chief Engineer**
Date: **4/13/15**

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/Russell Y. Tsuji

REF: DEA for Ho'ola Na Pua Residential Special Treatment Facility
Oahu.020

COMMENTS

- (X) We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zones AE and X. The National Flood Insurance Program regulates developments within Zone AE as indicated in bold letters below, but not in Zone X.
- () Please take note that the project site according to the Flood Insurance Rate Map (FIRM), is located in Zone ____.
- () Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is ____.
- (X) Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- (X) Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.
- () Mr. Frank DeMarco at (808) 961-8042 of the County of Hawaii, Department of Public Works.
- () Mr. Carolyn Cortez at (808) 270-7253 of the County of Maui, Department of Planning.
- () Mr. Stanford Iwamoto at (808) 241-4896 of the County of Kauai, Department of Public Works.
- () The applicant should include project water demands and infrastructure required to meet water demands. Please note that the implementation of any State-sponsored projects requiring water service from the Honolulu Board of Water Supply system must first obtain water allocation credits from the Engineering Division before it can receive a building permit and/or water meter.
- () The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.
- () Additional Comments: _____

- () Other: _____

Should you have any questions, please call Mr. Dennis Imada of the Planning Branch at 587-0257.

Signed: Carty S. Chang
CARTY S. CHANG, CHIEF ENGINEER

Date: 4/15/15



North Shore Consultants, LLC

Mr. Russell Y. Tsuji, Land Administrator
State of Hawaii
Department of Land and Natural Resources
P.O. Box 621
Honolulu, HI 96809

Dear Mr. Tsuji:

Comments Received on the DEA Ho'ōla Nā Pua Residential Special Treatment Facility

Ho'ōla Nā Pua wishes to thank you for your review and comments on the Draft Environmental Assessment for the proposed redevelopment of the Special Residential Treatment Facility. These comments are valuable considerations in our long term planning and design. We confirm that the project site is located in flood zones AE and X. The project will comply with the rules and regulations of the National Flood Insurance Program and Community Flood Ordinances.

The FEA has been amended to include projected potable and non-potable water requirements, as requested by the Commission on Water Resources Management.

We look forward to continuing to work together to protect and serve the needs abused girls in Hawaii.

Sincerely,

North Shore Consultants, LLC

Devin J. Robichaux, Project Manager
PO Box 100
Kunia, HI 96759

(808) 637-8030 office
(808) 368-5352 cell
robichaud001@hawaii.rr.com



NORTH SHORE NEIGHBORHOOD BOARD NO. 27

c/o NEIGHBORHOOD COMMISSION • 530 SOUTH KING STREET ROOM 406 • HONOLULU, HAWAII 96813
PHONE (808) 768-3710 • FAX (808) 768-3711 • INTERNET: <http://www.honolulu.gov/nco>

March 30, 2015

George Atta
Director, Department of Planning and Permitting
650 S. King St
Honolulu, HI 96813

Aloha Director Atta:

This letter will serve as notice that the North Shore Neighborhood Board No. 27 at the Tuesday, March 24, 2015 Board meeting unanimously supported the Conditional Use Permit (major) request by Hoola Na Pua. The facility will be used to help young girls who are victims of sex-trafficking. We see this facility as a first step in the process to heal these victims and are glad that our community can be part of the solution.

Please contact me if you have any questions.

Mahalo,

Kathleen M. Pahinui for:

Kathleen M. Pahinui,
Chair, North Shore Neighborhood Board No. 27

cc:

Dave Robichaux
Jody Allione
Jessica Munoz



North Shore Consultants, LLC

Kathleen Pahinui, Chair
North Shore Neighborhood Board (#27)
c/o Neighborhood Bd. Commission
530 South King St. Rm. 406
Honolulu, HI 96813

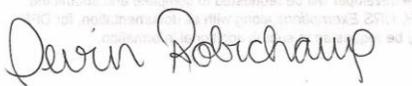
May 25, 2015

Comments Received on the DEA Ho'ōla Nā Pua Residential Special Treatment Facility

Ho'ōla Nā Pua wishes to thank you for your support on the Draft Environmental Assessment for the proposed redevelopment of the Crawford Convalescent Home to the Residential Special Treatment Facility. This support and the comments received during our meeting are valuable considerations in our long term planning and design.

We look forward to continuing to work together to protect and serve the needs abused girls in Hawaii.

Sincerely,



North Shore Consultants, LLC

Devin J. Robichaux, Project Manager
2091 Round Top Drive
Honolulu, HI 96822

(808) 637-8030 office
(808) 368-5352 cell
robichaud001@hawaii.rr.com

Sunset Beach Community Association
P.O. Box 471
Haleiwa HI 96712

3/18/2015

North Shore Neighborhood Board
530 S. King Street #406
Honolulu, HI 96813

Dear Chair Pahinui and Board Members,

The Sunset Beach Community Association unanimously supports all phases of development as well as the operational plans for the Ho'ola Na Pua facility. There is an overwhelming need for this home in the existing service deficit environment that has no facilities or services specifically for child-victims of sex trafficking in Hawaii. Helping these children benefits our community.

Sincerely,



Andrea Woods
Corresponding Secretary
Sunset Beach Community Association

cc: Ellyn Sollars, Ho'ola Na Pua
Jody Allione, Ho'ola Na Pua



North Shore Consultants, LLC

Sunset Beach Community Association
PO Box 471
Haleiwa, HI 96712

May 25, 2015

Comments Received on the DEA Ho'ōla Nā Pua Residential Special Treatment Facility

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Sincerely,

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DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

CARTY S. CHANG
INTERIM CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
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FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

April 10, 2015

Department of Planning and Permitting
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

LOG NO: 2015.00681
DOC NO: 1503LS10
Archaeology, Architecture

Dear Mr. or Ms.:

SUBJECT: **Chapter 6E-42 Historic Preservation Review –
Building Permit Application, 2014/IBP12774
58-130 Kamehameha Hwy., Haleiwa – New partial perimeter fence
Honolulu Ahupua‘a, Kona (Honolulu) District, Island of O‘ahu
TMK: (1) 5-8-001:051**

Thank you for the opportunity to review this permit application to install a new partial perimeter fence and landscaping on the property at 58-130 Kamehameha Highway to address vandalism issues. We received this submittal on February 18, 2015. The property totals 50,403 square feet. Installation of the 1,000-foot section of chain link fencing and landscaping involves excavation of concrete footings extending up to 2 feet below grade in areas previously disturbed by existing landscaping.

A review of our records indicate that this parcel has not been subjected to an archaeological inventory survey and that no historic properties have been identified. Our records also indicate that archaeological resources have been identified along the coast in proximity, but outside the current project area. These archaeological historic properties include several cultural layers, including SIHP 50-80-02-3735 (Simmons and Davis 1988) and SIHP 50-80-01-5790 (Souza et al. 2000), and Kalou Fishpond identified as SIHP 50-80-01-257 (Yent and Ota 1981). The USDA identifies the soils in within the subject property as Waialua silty clay loam, 3-8% slopes (WkB) (Foote et al. 1972).

The property was first developed in 1903 as the Waialea Industrial School for Boys. The school operated until the 1950s when it was replaced by the Crawford Convalescent Home. Many structures and buildings dating from the early part of the 20th century remain on the property. Thus, the facility is eligible for listing on the Hawaii and National Registers of Historic Places under Criteria A and C.

Based on the above information, **we believe no historic properties will be affected.**

Please attach to the permit: In the unlikely event that subsurface historic resources, including human skeletal remains, structural remains, cultural deposits, artifacts, sand deposits, or sink holes are identified during the demolition and/or construction work, cease work in the immediate vicinity of the find, protect the find from additional disturbance, and contact the State Historic Preservation Division, at (808) 692-8015.

Please contact Anna Broverman at (808) 692-8023 if you have any questions regarding architectural resources. Please contact me at (808) 692-8019 if you have any questions regarding archaeological resources or this letter.

Aloha,

A handwritten signature in cursive script that reads "Susan A. Lebo".

Susan A. Lebo, PhD
Oahu Lead Archaeologist
Acting Archaeology Branch Chief



North Shore Consultants, LLC

Dr. Susan Lebo, Lead Archaeologist
State Historic Preservation Division
PO Box 621
Honolulu, HI 96809

May 15, 2015

Comments Received on the DEA Ho'ōla Nā Pua Residential Special Treatment Facility

Ho'ōla Nā Pua wishes to thank you for your support on the Draft Environmental Assessment for the proposed redevelopment of the Crawford Convalescent Home to the Residential Special Treatment Facility. Our discussions with Dr. Ana Broverman of your staff and the comments received during our meeting are valuable considerations in our long term planning and design.

We look forward to continuing to work together to protect and serve the needs abused girls in Hawaii.

Sincerely,

North Shore Consultants, LLC

Devin J. Robichaux, Project Manager
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Honolulu, HI 96822

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