



**U.S. Department of Housing and Urban
Development**

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Washington, DC 20410
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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Hale Ola O Mohouli Affordable Housing

Responsible Entity: County of Hawai'i

Grant Recipient (if different than Responsible Entity): Hawaii Island Community Development Corporation (HICDC)

State/Local Identifier: South Hilo District, Hawai'i (Hawai'i Island)

Preparer: Geometrician Associates

Certifying Officer Name and Title:

Mr. Mitchell D. Roth, Mayor, County of Hawai'i

Consultant (if applicable):

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Direct Comments to:

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Project Location: The project site is located within the State of Hawai‘i, County of Hawai‘i, South Hilo District, in the town of Hilo (see Maps, Photos and Site Plan in Exhibit 1). The project site on which the Proposed Project would occur, TMK (3) 2-4-001:168, is a State property that was transferred via Executive Order (EO) 4531 for Affordable Housing Purposes to the County of Hawai‘i. The 9.091-acre site currently consists of lightly disturbed native ‘ōhi‘a forest on the 1881 lava flow. The project site is within land that was recently reclassified from the State Land Use Agricultural District to the Urban District by the Hawai‘i County Planning Commission. The official County zoning district is Agricultural, 1-acre minimum lot size, but the zoning is being changed to Multi-family Residential 4,000 square feet through the State of Hawai‘i’s 201-H process.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]: The Hawaii Island Community Development Corporation (HICDC) seeks to develop the Proposed Project. The development concept is to provide affordable rentals for seniors and families within a pocket neighborhood where the cluster of units is arranged around a central green. The units will be single-family dwellings, duplexes, and four-plex structures, one or two stories in height. An illustration of this development type for this site is shown in the Site Plan in Exhibit 1. There will be a maximum of 90 residential units. The Proposed Project would remove existing vegetation, grade the surface while balancing cut and fill to enable utilization of existing onsite material, install utilities (including a connection to the municipal water and wastewater systems), install a border fence on the western side of the property, create residential spaces, construct buildings, and provide accessways, parking and landscaping for each building.

In 2023, HICDC will finalize design, secure financing and apply for Plan Approval to the Planning Department, and then apply for a grading and grubbing permit and various building permits. The estimated cost for the Proposed Project is \$46.7 million. The project is expected to be ready for construction in mid-2024 and completed mid-2025.

HICDC seeks funding through the Hawai‘i Housing Finance and Development Corporation (HHFDC), including federal Low Income Housing Tax Credits, Project Based Section 8 Rental Assistance, and Tax Exempt Bonds from the U.S. Department of Housing and Urban Development (HUD).

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]: The purpose of the Proposed Project is to meet a portion of the demand for affordable rental housing in East Hawai‘i. Since 1991, HICDC has been providing housing for low and moderate income residents on the Island of Hawai‘i. Until recently, home construction on the Big Island had outpaced population growth, albeit skewed to upper income levels. Since shortly after the start of the coronavirus pandemic, the demand for housing has skyrocketed – partly fueled by mainland retirees and tech workers fleeing crowded urban areas – and the affordable housing crisis has worsened. The Proposed Project would answer the need for additional affordable rental housing in East Hawai‘i at a centrally located site supplied with existing utility infrastructure, within a mile or two of shopping, schools, and job centers.

A Market Study prepared for this project by Collier’s International (Exhibit 14, Appendix 5) reviewed the need for affordable rental housing for households with incomes 60% of the median

income and below. The area of coverage was generally Hilo and its secondary market areas, from Wainaku to Pepe'ekeo and Kea'au to Kurtistown, and specifically for the project site. The analysis concluded that after accounting for available affordable rental housing units there remains a large demand:

Unmet Housing Demand, All Households 60% Annual Median Income (AMI) and below

Hilo Primary Trade Area	5,152 units
Secondary Trade Area	1,266 units
Total	6,418 units

Unmet Housing Demand, Senior Households 60% AMI and below

Hilo Primary Trade Area	842 units
Secondary Trade Area	56 units
Total	1,098 units

Demand for Affordable Units at Hale Ola O Mohouli

Total 60% AMI and below	373-708 units
Senior Units	62-117 units

This indicates that there is a substantial need for affordable rental housing such as that proposed.

Existing Conditions and Trends [24 CFR 58.40(a)]: The project matches the urbanization trend of this central area of Hilo. It is situated between the residential agricultural subdivision (i.e., large lot suburban) of Sunrise Estates and two increments of senior housing, a senior adult day care facility and the in-construction Fire and Police Dispatch Center. The site is ideally sited for affordable rental housing because of existing water and wastewater utilities and the presence of nearby medical, government, social service, and recreational services and facilities.

Estimated Total Project Cost and HUD Funded Amount. [24 CFR 58.32(d)]: The total estimated project cost is \$46.7 million. This excludes the HUD amount of \$15,000,000 that may be awarded as rental subsidy after completion of construction.

Funding Information

Source	Status	Funding Amount
Federal Low-Income Housing Tax Credit Equity	Proposed	\$20,768,375
State Low-Income Housing Tax Credit Equity	Proposed	5,192,094
Rental Housing Revolving Fund (State of Hawaii)	Proposed	17,281,517
Bank Loan	Proposed	3,500,000
Total Development Cost		\$46,741,985

Note: \$15,000,000 in project-based vouchers will support operations of the project following completion of construction.

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	An April 2021 site visit by Geometrician Associates and USGS maps and Hawai'i DOT websites confirmed the project site is more than 2,500 feet from the end of a runway at a civil airport and 15,000 feet from the end of a runway at a military airfield. The closest airport is Hilo International Airport (ITO) at a distance of 11,800 feet to the east. ITO is classified by the FAA National Plan of Integrated Airport Systems as a small-hub primary commercial service facility with no plans to expand runways. Exhibit 1 (USGS Map); http://aviation.hawaii.gov/airfields-airports/ http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_14225.pdf
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	There are no coastal barrier resources in Hawai'i. There are no streams or surface water features at the project site, and the nearest body of water is the Pacific Ocean, located 1.5 miles to the north. Exhibit 2 (Coastal Barriers Web Page); https://www.fws.gov/CBRA/Maps/Mapper.html https://www.fws.gov/cbra/
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Flood insurance is not required because the project site is in Flood Zone X and outside the 500-year floodplain. Refer to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM). Exhibit 3 (Flood Zone Report); http://gis.hawaiiinfip.org/FHAT

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The ambient air quality of the project site meets all federal and state standards as evidenced by its designation as an “attainment area” by the Environmental Protection Agency and the State DOH, Clean Air Branch. The air quality of the project site is not greatly affected by man-made air pollutants. The Proposed Project would not adversely impact local or regional air quality.</p> <p>https://health.hawaii.gov/cab/hawaii-air-quality-data-books/</p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>HRS 205A defines the coastal zone as “all the lands of the State and the area extending seaward from the shoreline to the limit of the State’s police power and management authority, including the United States territorial sea”; the project site is thus located in the coastal zone management area. The nearest coastal waters are located approximately 1.5 miles north of the project site in Hilo Bay. The site outside the Special Management Area (SMA) of the Hawai‘i Coastal Zone. HUD projects in the State of Hawai‘i do not require individual consistency review by the Hawai‘i Coastal Zone Management Program.</p> <p>Exhibit 4 (HCZMP Worksheet, Memo and Planning Department SMA Exemption Letter)</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Phase 1 ESA for the site prepared by Myounghee Noh and Associates in 2016 observed no recognized environmental conditions (RECs). The property has not changed since that time, and February 2022 observation of the property and consultation of State databases reveal no incidents or developments that could produce RECs, such (USTs), Leaking Underground Storage Tanks (LUSTs), or records of incidents or releases at the project site or in adjacent properties.</p> <p>Exhibit 5 (Phase 1 ESA); (https://eha-cloud.doh.hawaii.gov/iheer#!/viewer).</p>

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Vegetation consists of low to medium-stature forest (20-30 feet) dominated by the natives ‘ōhi‘a lehua (<i>Metrosideros polymorpha</i> var. <i>incana</i>) and the mat-forming fern, uluhe (<i>Dicranopteris linearis</i>). The entire site is also lightly to moderately infested with various invasive trees and shrubs, notably Asian melastome (<i>Melastoma candidum</i>) and strawberry guava (<i>Psidium cattleianum</i>). Wide-ranging but threatened or endangered birds including Hawaiian stilts, Hawaiian geese, and Hawaiian seabirds may overfly the area, and endangered Hawaiian hoary bats may roost in tall shrubs or trees, as it does in all parts of the island. Section 7 informal consultation has concluded and the determination is not likely to adversely affect listed species, with standard mitigation.</p> <p>Exhibit 6 (Section 7 Endangered Species Act Correspondence)</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Phase I ESA for the site prepared by Myounghee Noh and Associates 2016 observed no explosive or flammable hazards, and this was field confirmed by R. Terry in February 2022.</p> <p>Exhibit 5</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Proposed Project is not located on formally designated Important Farmland, as shown in the Agricultural Lands of Importance to the State of Hawai‘i (ALISH) GIS data.</p> <p>Exhibit 7 (Farmlands Protection Policy Act - ALISH Map)</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is in Flood Zone X and outside the 500-year floodplain. Refer to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM). Exhibit 3; http://gis.hawaiiinfip.org/FHAT</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Archaeological studies pursuant to Hawai‘i State laws (Chapter 6E HRS) were conducted at the project site. The State Historic Preservation Division (SHPD) concurred by letter of January 15, 2021 with the finding of no historic properties affected. OHCD, which is designated by HUD with</p>

		<p>the authority to conduct Section 106 consultation, initiated consultation with the State Historic Preservation Officer (SHPO) and provided a determination of no historic properties affected and requested SHPO concurrence by letter of April 8, 2022, which was recorded into the digital portal for SHPO on June 22, 2022. By letter of July 25, 2022, the SHPO concurred with the Section 106 finding of no historic properties affected. Additionally, Section 106 consultation letters describing the proposed undertaking, the APE, and the findings of proposed were sent to the Office of Hawaiian Affairs (OHA), the Hawaiian Civic Club of Hilo, the Order of Kamehameha, and other individuals in the community on April 8, 2022. No response was received from these or any other party. Accordingly, the determination of no historic properties affected has been finalized, and through the public notice afforded by publication of the FONSI and Section 106 determination, the Section 106 process is complete.</p> <p>Exhibit 9 (Archaeological report, SHPD approval letter of Chapter 6e archaeological letter report); Exhibit 15 (Section 106 consultation documents)</p>
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>For noise effects to the proposed housing, there are few noise generators in the vicinity (defined as 1000' from a major road, 3000' from a railroad, or 15 miles from an airport). No railroads operate on the island. The only roadway with appreciable traffic is Mohouli Street, which based on recent Traffic Impact Assessment studies (see Table 15, Appendix 2, Exhibit 14) will have peak hour traffic volumes of 800 to 840 vehicles in 2025, translating to an average daily traffic of about 8,000 vehicles per day, equivalent to a minor arterial roadway in a small city and not considered a major roadway. One small-plane runway at Hilo International Airport is 11,800 feet away from the project site, and thus within 15 miles. However, the site is not</p>

		<p>under a flight path and experiences no noise impacts. In the SE direction from the airport, the 55 decibel DNL (Day-Night Noise Level) contour is 11,700 feet from the project site. Construction will entail moderate noise from operation of heavy equipment during grading and construction. Where construction noise is expected to exceed the State DOH “maximum permissible” property-line noise levels, builders must obtain a permit per Title 11, Chapter 46, HAR (Community Noise Control) prior to construction. DOH reviews the proposed activity, location, equipment, project purpose, and timetable to decide upon conditions and mitigation measures, such as restriction of equipment type, maintenance requirements, restricted hours, and portable noise barriers. HICDC and/or its construction contractor will consult with DOH to determine any need for a permit noise reduction measures. During operation, moderate levels of noise consistent with that from neighboring residential subdivisions is anticipated.</p> <p>Exhibit 10 (HUD Noise Worksheet and Noise Exposure Map, Hilo International Airport)</p>
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There are only two sole source aquifers in Hawai‘i: Southern Oahu Basal Aquifer and Molokai Aquifer. The project site is not located on an island with a sole source aquifer. https://www.epa.gov/dwssa/map-sole-source-aquifer-locations</p> <p>Exhibit 8 (EPA Sole Source Aquifer Map)</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Site inspection by biologist Ron Terry as well as the U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory, Wetlands Mapper did not identify any wetlands in the project area.</p> <p>Exhibit 11 (National Wetlands Inventory Map); https://fws.gov/wetlands/data/Mapper.html</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There are no designated Wild and Scenic Rivers in the State of Hawai‘i.</p> <p>Exhibit 12 (National Scenic Rivers Web Map); https://www.rivers.gov/hawaii.php</p>

ENVIRONMENTAL JUSTICE

Environmental Justice

Executive Order 12898

Yes No

The Governor and Legislature of Hawai'i have identified a need for affordable housing in Hawai'i, a majority-minority state in which the white population is less than 40%. The Proposed Project involves the new construction of up to 90 affordably-priced rental units. The target population is low-income families and seniors. There are no adverse environmental conditions affecting the project site and very minor and mitigable adverse environmental effects from the proposed action. The development will have a positive effect on the targeted community, providing much needed affordable rental housing in the County and State of Hawai'i.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The Proposed Action is fully consistent with the State Land Use Designation (Urban), the County zoning (Residential, obtained through the Section 201H, Hawai'i Revised Statutes (HRS) process) and the County General Plan (Medium Density Urban). It would be compatible with adjacent residential and recreational uses in intended use, scale and design.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	3	<p>Construction activities for the Proposed Project would involve the shallow and rocky Keaukaha highly decomposed plant material soil type. Disturbed soils are susceptible to erosion during periods of heavy rain or wind. To minimize any potential impacts to soils, construction of the Proposed Project would conform to Chapter 10 (Erosion and Sedimentation Control), Chapter 27 (Drainage and Flooding) and Chapter 22 (County Streets) of the Hawai'i County Code. Grading of the project site during construction would be conducted in accordance with the grading permit which would be issued by Hawai'i County.</p> <p>Prior to the initiation of construction for the Proposed Project, HICDC would ensure that a National Pollutant Discharge Elimination System (NPDES) general permit is in place. The permit would specify best management practices (BMPs) for stormwater pollution prevention. Oversight of the BMPs would be conducted weekly for the duration of construction,</p>

		<p>with updates and corrective actions documented and transmitted to the State DOH, CWB.</p> <p>Chapter 27 and the County’s Storm Drainage Standards require increases in runoff due to a project’s development be captured and disposed of. Project engineers will calculate the site’s post-development runoff using the Storm Drainage Standards. Drainage structures that may include lava sumps, seepage drains, structures not requiring underground injection control permits, and/or drywells will be designed and constructed to capture and retain the increase in rainfall runoff generated by the development. A typical seepage drain structure has a percolation rate of 2 cubic feet per second (cfs), and a typical drywell structure has a percolation rate of 6 cfs. Final design will determine the type, number and placement of these structures.</p>
Hazards and Nuisances including Site Safety and Noise	3	<p>During construction of the Proposed Project, there would be moderate levels of noise from the operation of heavy equipment during grading and construction. In cases where construction noise is expected to exceed the State DOH “maximum permissible” property-line noise levels, builders must obtain a permit per Title 11, Chapter 46, HAR (Community Noise Control) prior to construction. DOH reviews the proposed activity, location, equipment, project purpose, and timetable in order to decide upon conditions and mitigation measures, such as restriction of equipment type, maintenance requirements, restricted hours, and portable noise barriers. HICDC and/or its construction contractor will consult with DOH to determine if a permit will be required and what, if any, noise reduction measures are necessary. During operation, moderate levels of noise consistent with that from neighboring residences and government administration uses is anticipated. Therefore, the Proposed Project is not expected to significantly impact any sensitive uses within the vicinity of the project site.</p>
Energy Consumption	2	<p>The Proposed Project would not require substantial energy consumption. The Proposed Project will require the short-term commitment of fuel for construction equipment; however, this would not result in a substantial consumption of energy resources. Although there would be increased demand for electricity once the Proposed Project is in operation, this is not considered excessive within the region’s overall energy consumption and could be accommodated with existing infrastructure. All structures will be equipped with solar water heating. Occupation of the housing would entail greenhouse gas emissions that would be essentially the same regardless of where the residents live, leading to no net increase and perhaps a decrease. The Proposed Project would not be expected to contribute significantly to global climate change.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	The Proposed Project would generate work for the local construction industry, which would stimulate local economic spending. Over the long term, residents of the facility will contribute to the economy through the payment of sales taxes and consumption of goods and services from local businesses.
Demographic Character Changes, Displacement	1	The Proposed Project would balance the social welfare of the community by providing affordable rental housing at a site well-served by government and commercial services and jobs and for which marketing studies have shown a large, unmet demand for affordable housing. The provision of such housing benefits the residents and entire community.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	This area of Hilo is serviced by Kapiolani Elementary, Waiakea Intermediate School, and Waiakea High School. Several public charter schools operate in Hilo. No effect on the school system as a whole is expected, because nearly all families with school age children would already reside in the general area. Hilo is endowed with several cultural facilities including museums; none would be affected.
Commercial Facilities	2	The Proposed Project is not expected to impact commercial facilities. No commercial facilities are needed for the Proposed Project. Nearly all of Hilo's existing and planned commercial facilities are present within one to three miles of the site.
Health Care and Social Services	2	The Proposed Action is expected to have no adverse impact on health care or social services on the island. Medical services are available at Hilo Medical Center, approximately 2 miles away. Numerous medical offices are present in the general area. Social services are concentrated in the greater downtown Hilo area, within 2 miles of the site.
Solid Waste Disposal/ Recycling	3	<p>There will be a short-term increase in solid waste during project construction. Waste generated during construction will primarily consist primarily of waste construction material and packaging, as the site is already undeveloped.</p> <p>During project operation, solid waste generated by residents would be hauled off site by a private contractor on a regular basis to a solid waste management facility in compliance with the applicable provisions (HAR, Chapter 11-58.1, "Solid Waste Management Control"). No burning of wastes would occur on site during construction or during operation of the Proposed Project. Post-construction, receptacles would be installed throughout the project site to encourage residents to recycle HI-5 containers, glass, and cardboard.</p>

Waste Water / Sanitary Sewers	2	Wastewater will be conveyed to the County wastewater plant by installation of a sewer line along the north property lines of parcels TMK: 2-4-1: 176 and 177 that will tie into the sewer manhole on parcel 177.
Water Supply	2	A 12-inch waterline fronts the property within the Mohouli Street right-of-way, and a 12-inch line is within the Kupuna Street right-of-way. The project would connect both lines through the property and provide ample water supply and fire flow. The Department of Water Supply (DWS) has indicated that water will be available for the project and has provided conditions for granting a water commitment (see Exhibit 13, letter of June 10, 2021). Information about the project has been supplied to the Planning Department and DWS for incorporation into the County's Water Use and Development Plan; water efficient practices and fixtures are an integral part of project design; stormwater will be handled appropriately onsite; landscape irrigation will be minimal, because of the climate of the area; and water uses will be calculated by an engineer to ensure adequate evaluation of the project's impact upon water use and resources. No impact to public trust water would be expected. The landscaping will require only infrequent watering and low volumes of water because of the high annual rainfall of the area.
Public Safety - Police, Fire and Emergency Medical	2	The Proposed Project is not expected to have adverse impacts on public safety on the island. Fire, police, and emergency medical services are available within one to two miles.
Parks, Open Space and Recreation	2	The Proposed Project is not expected to have any adverse impact on the recreational facilities on the island. The Department of Parks and Recreation operates and maintains numerous facilities including sports fields, gymnasiums, and walking parks within three miles. The Proposed Project will provide circulation pathways suitable for daily use by residents.
Transportation and Accessibility	2	Current average daily traffic on Mohouli Street in this vicinity is not measured, but based on peak hour traffic counts is approximately 8,000, according to a recent Traffic Impact Assessment Report (TIAR – see Appendix 2 of Exhibit 13). The Proposed Project is projected to generate 48 vehicles per hour (vph) during the AM peak hour, with 10 vph inbound and 38 vph outbound. In the PM peak hour, it is expected to generate 68 vph, with 44 vph inbound and 24 vph outbound. Even factoring in reasonably foreseeable nearby projects, the additional generated traffic is forecasted to have minor impacts on intersection operations at the intersections in the vicinity. Assisting in reducing traffic impacts to minimal levels is a proposed driveway at the mauka end of the property, which will be restricted to right-in/right-out movements. This will help handle many inbound trips and also mauka-bound outbound trips, and will reduce the number of vehicles entering and existing at Kupuna Place. The existing roadway infrastructure will accommodate traffic generated by the proposed Hale Ola O Mohouli development. The site is expected to be served by Mass Transit.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	As described under Water Supply, the Proposed Project is not expected to result in adverse impacts to water quantity. As described under Wastewater, the Proposed Project is not expected to result in adverse impacts to water quality.
Vegetation, Wildlife	3	No significant adverse impacts to flora/fauna are expected from the Proposed Project. No threatened or endangered plant species are known to exist at the project site. Mitigation to ensure no adverse impacts to island-wide ranging listed fauna species will be required during construction.
Other Factors	2	No significant adverse impacts to natural hazard vulnerability would result from the Proposed Project. Although the project site is in an area with volcanic and seismic risk, nearly the entire Island of Hawai'i shares this risk. The facilities are not imprudent to construct and will employ design and construction standards appropriate to the seismic zone. The property is not located in a floodplain or any other hazardous area, and it would not affect any such area. Due to the elevation of the property at approximately 350 feet above sea level, there is no risk to the Proposed Project from sea level rise, and it is outside the area that should be evacuated during a tsunami warning. The design has accounted for climate change and the potential for larger storms through minimizing hard surfaces that generate runoff in heavy rainfall and designing for adequate wind loads.

Additional Studies and Field Inspections Performed:

August 2020	Archaeological Field Inspection
December 2016	Phase I Environmental Site Assessment
December 2020	Biological Survey
March 2022	Section 7 Endangered Species Act Consultation
April 2022	Section 106 National Historic Preservation Act Consultation

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

As listed below, various Federal, State, and County agencies, as well as organizations and neighbors, were consulted during the preparation of the Chapter 343 (Hawai'i State EIS law) EA that preceded preparation of this NEPA EA. Exhibit 14, Appendix 1a, contains a sample letter and all responses to early consultation; Appendix 1b contains comments letters to the EA and responses.

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The U.S. Fish and Wildlife Service was coordinated with pursuant to Section 7 of the Endangered Species Act. Exhibit 6 contains correspondence.

Lindsay Asman, Island Team Manager
U.S. Fish and Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, HI 96850

The following parties received a letter inviting participation in Section 106 consultation. Correspondence is contained in Exhibit 15 (Section 106 Consultation).

Mrs. C. Noelani Ho'opai Board of Director, Chair, Hui Mālama Ola Nā 'Ōiwi 1438 Kīlauea Ave. Hilo, HI 96720	Mrs. Noe Scott Interim Executive Director Hui Mālama Ola Nā 'Ōiwi 1438 Kīlauea Ave. Hilo, HI 96720	Mr. Samson L. Brown Au Puni O Hawai'i, President 21 Pohai Street Hilo, HI 96720
Mr. Joseph Kūhiō Lewis Council for Native Hawaiian Advancement, CEO 91-1270 Kinoiki St. Bldg 1 Kapolei, HI 96707	Ms. Lahela Williams Hawaiian Community Assets, Inc., ED 200 N. Vineyard Blvd., #A300 Honolulu, HI 96817	Mr. Patrick L. Kahawaiolaa Keaukaha Community Association, President PO Box 5146 Hilo, HI 96720
Mr. Hans Mortensen Royal Order of Kamehameha, CCO PO Box 6878 Hilo, HI 96720	Mrs. Noe Noe Wong-Wilson Hawaiian Civic Club of Hilo 2106 Kaiwiki Rd. Hilo, HI 96720	Sylvia M. Hussey, Ed.D Office of Hawaiian Affairs, Ka Pou Hana 560 N. Nimitz Hwy., Suite 200 Honolulu, HI 96817 email: ohacompliance@oha.org
No'el Tagab-Cruz I Ola Hāloa Center for Hawai'i Life Styles 1175 Manono Street Hilo, HI 96720-5096	Ola Jenkins Nā Wahine O Kamehameha pelekikena@mamalaho.org	Luana Kawelu 865 Pi'ilani Street Hilo, HI 96720
Coleen Haunani Medeiros Alu Like Inc., Kumu Kahi Elderly Services 32 Kino'ole St. #102 Hilo, HI 96720	Mapuana Waipa 162 Baker Ave. Hilo, HI 96720	Larry Kimura Ka Haka 'Ula O Ke'elikōlani 200 West Kāwili Street Hilo, HI 96720
Kalena Silva Ka Haka 'Ula O Ke'elikōlani 200 West Kāwili Street Hilo, HI 96720	Nako'olani Warrington 516 Auwae Road Hilo, HI 96720	Kalāho'ohie Mossman Edith Kanaka'ole Foundation 1500 Kalaniana'ole Ave. Hilo, HI 96720
Maile Lu'uwai Keaukaha-Pana'ewa Farmers Association PO Box 6844 Hilo, HI 96720	Kiersten Faulkner Historic Hawai'i Foundation The Dole Cannery 680 Iwilei Road Office Tower Bldg., Suite 690 Honolulu, HI 96817	Louis Hao DHHL East Hawai'i District Office, Supervisor 160 Baker Avenue Hilo, HI 96720
Kawika Urakami QLCC, Youth Development Specialist, Kīpuka Hilo 919 Ululani Street Hilo, HI 96720		

Public Outreach [24 CFR 50.23 & 58.43]:

Consultation for the EA included a letter to neighbors and various organizations (see Appendix 1a of Exhibit 13). These parties are indicated in italics in the list above. The Proposed Project was also the subject of public hearings before the Windward Planning Commission (November 4, 2021) and the Hawai'i County Council (January 19, 2022 and August 2, 2022).

List of Permits Required:

The Proposed Project requires granting the following permits and approvals, which are listed by responsible agency:

- County of Hawai'i, Department of Public Works, Building Division, Building Permits
- County of Hawai'i, Department of Public Works, Engineering Division, Grading Permit
- County of Hawai'i, Planning Department, Plan Approval
- State Department of Health (DOH), Clean Water Branch (CWB), National Pollutant Discharge Elimination System ("NPDES") Permit
- State Department of Land and Natural Resources, State Historic Preservation Division, Chapter 6e Historic Sites Clearance (obtained) and Section 106 NHPA Compliance
- U.S. Fish and Wildlife Service, Section 7 Endangered Species Act Compliance

Cumulative Impact Analysis [24 CFR 58.32]:

Cumulative impacts result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such actions. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time. Cumulative impacts include the direct and indirect impacts of a project together with the reasonably foreseeable future actions of others.

The Proposed Project will have very limited and temporary construction period impacts, such as noise, traffic, dust and sedimentation, in addition to permanent traffic impacts, all of which have been analyzed from the perspective of past, present and reasonably foreseeable future actions. Three other projects are known to be in planning in the vicinity during the next five years. Directly adjacent is the Fire and Police Dispatch Center, which is currently under construction and is expected to be operational by December 2022. About 1,000 feet away, on the land extending from the current terminus of Ponahawai Street between Komohana and the Mohouli Streets, is the proposed Wailani mixed-use project. In planning since 2009, and in early phases of infrastructure construction, the residential/commercial project is situated on a 171-acre parcel of land between Komohana Street and Mohouli Street. The design, which has varied widely over the decade of planning and may still be altered, currently calls for up to 700 residential units and a maximum commercial floor space of 420,000 square feet. Ponahawai Street would be extended to Mohouli Street to deal with traffic, and streets would have curbs, gutters and sidewalks to provide an urban and walkable feel. Finally, the Portuguese Cultural Center is planned for the corner of Komohana and Ponahawai Streets. The 6,000 square foot facility would be a museum, performance space and dining hall, with an outdoor garden and stone oven. Fundraising is underway and construction timing is not set. The project has recently been downsized.

During construction, there is at least a small potential for noise, traffic and dust impacts from the four projects to accumulate, under the scenario of two or more being constructed at the same time. These impacts are mitigable and can be handled by construction-phase measures that can easily be implemented by the Hawai'i County DPW in coordination with the HICDC and other parties involved in construction. As discussed above in relation to transportation, permanent traffic levels on Mohouli and Komohana Street would clearly rise as a result of all four projects – with most attributable to the Wailani project – but would be largely mitigated by the built-in mitigation associated with the Wailani project of the extension of Ponahawai Street to Mohouli Street. Cumulative traffic impacts would be minor and level of service would remain acceptable.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

HICDC's ability to develop affordable rental housing in partnership with the County is contingent on low- to no-cost land that has been set aside by government agencies for affordable housing or by private parties as part of affordable housing requirements.

The property was designated by the State Department of Land and Natural Resources as a site for affordable rentals and has been turned over to the County of Hawai'i for such development. HICDC monitors the availability of suitable affordable housing sites such as this throughout the County of Hawai'i. The only other government-owned and currently available site within central Hilo that has necessary access to the County sewer system is a 0.34-acre site on Puainako Street makai of Komohana Street (TMK 3-2-4-1:156). That site is much smaller than needed and has significant slopes unsuitable for the proposed development concept, and it is not being considered further. No other suitable sites have been identified; therefore, no alternative sites have been advanced in this Environmental Assessment.

In some cities, existing structures such as commercial and market housing complexes can simply be renovated and converted to affordable rental housing. This can be an economical solution that utilizes existing materials and land in an efficient manner. However, in order to be cost-effectively converted, the complexes need to be in reasonably good condition and have the utility and other infrastructure necessary for housing consistent with modern codes and regulations. To HICDC's knowledge, no existing sites meet these conditions. HICDC therefore does not consider any such actions as worthy of consideration at this time, and therefore it has not advanced in this Environmental Assessment as an alternative.

No Action Alternative [24 CFR 58.40(e)]:

Under the No Action Alternative, the County of Hawai'i would not construct the affordable rental housing project on this or any other site in the area. The benefits provided by the expansion of housing opportunities would not be realized, but there would be no disturbance of the existing ground surface or vegetation, no traffic impacts, and no temporary impacts to noise, dust and scenery. The No Action Alternative provides a baseline for comparing the impacts of the Proposed Project.

Summary of Findings and Conclusions:

The Proposed Project's design responds to the County General Plan's call for development of uses suitable for Medium Density Urban in this area. No archaeological resources or other historic properties are present. No impacts to cultural sites or practices are expected from the Proposed Project. There are no waters of the U.S. or critical habitat on or near the project site. Potential impacts to habitat for federal or State listed endangered will be avoided through monitoring and implementation of vegetation removal timing measures. Project design and construction BMPs will ensure minimal erosion and sedimentation, and no effects to surface waters in terms of quantity and quality would occur. No conditions were observed or identified during professional site evaluation or searches of environmental databases that indicate concerning toxic or hazardous conditions, and there are no explosive or flammable hazards present. The nature and scale of the Proposed Project is such that no significant environmental effects are anticipated. Potential impacts can be mitigated through construction management practices, environmental protection measures, and compliance with all federal, state and local

governmental requirements. A Finding of No Significant Impact was made for the Proposed Project under State environmental law (Chapter 343, HRS), which was declared by the County of Hawai'i Planning Department and published in the Hawai'i State Office of Environmental Quality Control's *Environmental Notice* on October 8, 2021 (see Exhibit 14). Given these facts and considerations, a National Environmental Policy Act (NEPA) Finding Of No Significant Impact (FONSI) for the proposed action appears appropriate.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarized below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Endangered Species Act, U.S. Fish and Wildlife Service	<p>HICDC will ensure that as part of construction contracts, mitigation for federally listed Hawaiian hoary bats, Hawaiian seabirds, Hawaiian stilts and Hawaiian geese, as well as the State-listed Hawaiian hawks, would be implemented. Specifically:</p> <ol style="list-style-type: none"> 1. To minimize potential impacts to Hawaiian hoary bats: <ul style="list-style-type: none"> • Woody plants taller than 15 ft will not be disturbed, removed, or trimmed during the birthing and rearing season (June 1 through September 15). • Barbed wire will not be used. 2. To avoid and minimize potential project impacts to Hawaiian seabirds, the following applicable measures will be taken: <ul style="list-style-type: none"> • Nighttime construction will be avoided during the seabird fledging period, from September 15 through December 15. • All permanent lighting will conform to the Hawai'i County Outdoor Lighting Ordinance (Hawai'i County Code Chapter 9, Article 14), which requires shielding of exterior lights to lower the ambient glare caused by unshielded lighting. • The project will utilize energy efficient outdoor lamps with warmer colors (less blue light) and energy efficient fixtures on an operational basis after buildings are constructed. 3. To avoid and minimize impact to Hawaiian stilts: <ul style="list-style-type: none"> • Signage will be posted, and reduced speed limits implemented to inform project personnel and contractors about the presence of endangered species on-site when it occurs. • A biological monitor that is familiar with the species' biology will survey for stilt nests or breeding birds where appropriate habitat occurs within the vicinity of the proposed project site prior to project initiation. Surveys will be repeated again within 3 days of project initiation and

	<p>after any subsequent delay of work of 3 or more days (during which the birds may attempt to nest). If a nest or active brood is found:</p> <ul style="list-style-type: none"> o The Service will be contacted within 48 hours for further guidance. o A 100-foot buffer will be established and maintained around all active nests and/or broods until the chicks/ducklings have fledged. Potentially disruptive activities or habitat alteration will be avoided within this buffer. o A biological monitor that is familiar with the species' biology will be present on the project site during all construction or earth moving activities until the chicks/ducklings fledge to ensure that the sitl and nests are not adversely impacted. <p>4. To avoid adverse effects to the nēnē, the following measures will be implemented:</p> <ul style="list-style-type: none"> • The nēnē will not be approached, fed, or disturbed. • If nēnē are observed loafing or foraging within the project area during the breeding season (September through April), a biologist familiar within nēnē nesting behavior will survey for nests in and around the project area prior to resumption of any work. Repeat surveys after any subsequent delay of work of 3 or more days (during which the birds may attempt to nest). • When nests are found within a 150-ft radius of project activities the work will cease immediately and the Service contacted for further guidance. • In areas where nēnē presence is known, signage will be posted to reduce speed limits and inform others of the presence of federally listed species on-site. <p>In addition to measures designed for specific listed species, the BIHF will implement following measures to avoid and minimize impacts to various listed species during and/or or after construction:</p> <ul style="list-style-type: none"> • Biosecurity protocols including cleaning and inspection of construction equipment for invasive species including frogs, rats, and mice would be applied during construction, as applicable. • Post and enforce low speed limits to reduce vehicle collisions with wildlife. • Require garbage cans with lids to reduce populations of rats and mongoose, which are invasive species and prey upon native and endangered species. • Provide signage instructing residents and visitors to avoid approaching, feeding, or disturbing wildlife • Monitor and treated the site for vectors that can pose risk to both humans and native biota, including T&E species.
<p>HAR, Chapter 11-46, Community Noise Control</p>	<p>HICDC will ensure that as part of construction contracts, grading activities will be limited to normal daylight hours in order to limit noise impact and adhere to the DOH's noise regulations for construction equipment.</p>

HAR Chapter 11-60.1, Air Pollution Control, Section 11-60.1-33, Fugitive Dust	HICDC will ensure that as part of construction contracts, all construction activities will comply with all applicable Federal, State, and County regulations and rules for erosion control. Before issuance of a grading permit by the County of Hawai'i, the final dust control plan will be completed.
Clean Water Act, U.S. EPA, NPDES Permit	Prior to the initiation of construction for the Proposed Project, HICDC would ensure that an NPDES permit is in place. The permit would require BMPs for stormwater pollution prevention. Oversight of the BMPs would be conducted weekly for the duration of construction, with updates and corrective actions documented and transmitted to the State DOH, CWB. Operationally, runoff from parking lots, driveways, and other surfaces will be conveyed to structures approved in conformance with Chapter 10 and Chapter 27 of the Hawai'i County Code in order to minimize pollution from offsite conveyance of stormwater.

Determination:

- Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.
- Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Ron Terry

Preparer Signature: _____ Date: 7/21/2022

Name/Title/Organization: Ron Terry, Principal, Geometrician Associates

Certifying Officer Signature: *[Signature]* Date: 2/10/23

Name/Title: Mr. Mitchell D. Roth, Mayor, County of Hawai'i

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).