COUNTY OF HAWAIʻI PLANNING DEPARTMENT
BACKGROUND REPORT

RENEGADE TOWERS LLC
USE PERMIT APPLICATION (PL-USE-2024-000028)

RENEGADE TOWERS LLC is requesting a Use Permit to allow the establishment of a multi-carrier telecommunication facility with a 150-foot-tall monopole tower and related equipment and improvements within a 15,423 square foot portion of a larger 32.721-acre parcel. The subject property is located at 12-4375 Pāhoa Kalapana Road, approximately 1,050 feet north of its intersection with Old Kalapana Road, Kīkala-Kēōkea Homesteads, Puna, Hawaiʻi, TMK: (3) 1-2-007:034 (por.).

APPLICANT'S REQUEST

1. **Request**: Renegade Towers LLC is seeking a Use Permit to construct a 150-foot-tall steel monopole tower with 24 panel antennas and associated equipment and improvements on a 15,423-square-foot section of a larger 32.721-acre parcel. The facility will include a 2,880-square-foot (36'x80') equipment area and a 12,423-square-foot access road. To blend with the surrounding environment, the monopole tower will be painted to match the tall trees along the road and designed to accommodate the co-location of multiple carriers. In addition to the monopole, the project will include ground-level facilities such as outdoor equipment cabinets, a utility H-frame, internal systems (including an air conditioner), and a diesel-powered emergency generator, all enclosed within a 6-foot-tall chain link security fence with locked gates. The tower will be constructed of structural galvanized steel and built to withstand a 137-mph wind load. The proposed facility would be unmanned, and maintenance and repair activities will be performed by a technician on a periodic basis. The applicant will comply with all Federal Communications Commission (FCC) and Federal Aviation Administration (FAA) rules. Additionally, the monopole will not interfere with the County's public safety radio system.
2. **Reason for the Request**: In 2019, the Windward Planning Commission granted Verizon Wireless a Use Permit (USE-19-00079) to construct a tower aimed at improving mobile

coverage in the Kalapana Sea View Subdivision, contingent upon securing legal access from Highway 130. However, Verizon encountered challenges using a paper road, and the County did not authorize improvements. As a result, Verizon began discussions with the Department of Transportation to obtain direct access from Highway 130. Due to the high cost and extended timeline associated with this option, Verizon requested the permit be revoked and the Planning Director revoked the permit in a letter dated October 21, 2024. Currently, at the request of County Civil Defense, Verizon Wireless and AT&T have deployed temporary Cell on Wheels (COWs) near the Star of the Sea Painted Church to provide cell coverage for emergency services related to a nearby lava viewing site. Although the lava viewing area has since closed, the COWs remain in place to meet ongoing service needs. Once the proposed permanent tower is built and reliable service is established for residents and emergency personnel, these temporary COW sites will be decommissioned.

3. **Landowner**: Renegade Towers, LLC.

4. **Supportive Information**: The applicant has submitted the attached in support of the request **(Planning Department Exhibit 1 –Use Permit Application accepted on September 9, 2024)**.

BACKGROUND INFORMATION

5. **Telecommunications Act of 1996:** The Telecommunications Act of 1996, Section 704, which amended portions of the 1934 Act, limits the state or local authorities from regulating the placement, construction and modification of personal wireless service facilities on the basis of environmental effects of radio frequency emissions, as long as such facilities/towers comply with the FCC's regulations concerning such emissions. The applicant will adhere to FCC guidelines.

6. **Co-Location:** The applicant has designed the proposed monopole to accommodate at least two (2) other wireless service providers. Verizon Wireless has committed to be the anchor tenant with the other carriers to follow sometime in the future. The Applicant will make this tower available to any carrier licensed in this market by the FCC.

STATE AND COUNTY PLANS

7. **State Land Use District:** Agricultural.

8. **General Plan LUPAG MAP:** The project site is in an area designated Extensive Agriculture.
9. **County Zoning:** Agricultural 3-acre (A-3a).
10. **Puna Community Development Plan (CDP)**: The Puna CDP was adopted by the Hawai‘i County Council, Ordinance 08 116, on September 10, 2008. Under Public Safety and Sanitation Services in the plan, Action 3.4.3(e) states “Encourage enhancement of cell phone service to expand coverage to more remote areas.”
11. **Special Management Area:** The Special Management Area is a part of the Coastal Zone Management Program and regulated by the County. The property is not located within the Special Management Area and is approximately 1.5 miles from the nearest coastline.

DESCRIPTION OF PROPERTY AND SURROUNDING AREA

12. **Description of Property:** The subject 32.721-acre property is irregularly shaped, heavily forested, and vacant of any buildings and improvements, but the archaeological field inspection and aerial photographs indicate several abandoned vehicles. The proposed project site is situated on the makai (south) side of the parcel near the eastern border.
13. **Surrounding Zoning/Land Uses:** Most of the surrounding properties are similarly zoned A-3a, with some A-1a and Forest Reserve (FR) zoning in the vicinity. Land uses consist of scattered dwellings, agricultural uses and vacant land. The closest dwelling to the proposed project area is approximately 670 feet to the west, across Pāhoa Kalapana Road.
14. **Flood Zone:** The subject property is in an area designated as Zone X on the Flood Insurance Rate Map (FIRM) by the Federal Emergency Management Agency (FEMA). Zone X is an area determined to be an area of minimal flood hazard.
15. **Flora and Fauna Resources:** The application included a document entitled; “Natural Resources Assessment” dated June 10, 2024, conducted by Ace Environmental LLC. The assessment found that the surveyed area is dominated by non-native vegetation, and its biological resources have been significantly altered due to human activities and the introduction of invasive species. No threatened, endangered, or sensitive species were observed at the site, and no critical habitats were identified. Recommendations for

protecting potential rare species include measures for the Hawaiian Hawk and Hawaiian Hoary Bat, such as pre-construction surveys and restrictions on clearing vegetation during sensitive periods to avoid disrupting these species. Additionally, precautions to minimize harm to nocturnally flying seabirds are advised, including proper lighting management to prevent disorientation and collisions. The area does not contain habitat for species such as the nēnē or Blackburn's Sphinx Moth, and no significant impacts to native vegetation like ʻōhiʻa lehua trees are expected, though care should be taken to prevent the spread of Rapid ʻŌhiʻa Death (ROD). The project's construction should follow best practices for communication tower siting and design to minimize ecological impacts, adhering to guidelines established by the U.S. Fish and Wildlife Service.

16. **Archaeological/Historic/Cultural Resources:** The application included a document entitled "Cultural Resources Review and Field Inspection" dated June 14, 2024, conducted by Ace Environmental LLC, which found that there would be no impacts on historic or cultural resources caused by the proposed project. In a letter dated August 31, 2023, the Department of Land and Natural Resources-State Historic Preservation Division (SHPD) made a determination of, "No historic properties affected" from the proposed project.

17. **Public Access:** There is no known public access to the mountains or the shoreline that runs through the proposed building site. However, there is an existing trail approximately 1,000 feet from the project site which will not be affected by the proposed project. The Cultural Resources Review and Field Inspection, done by ACE Environmental LLC, identifies the trail. SHPD reviewed this document and determined that this is not a historic trail.

18. **Noise/Air/Visual Impacts:** According to the applicant, the only source of emitted noise may be from an air conditioner necessary to maintain the correct temperature and humidity in the equipment cabinets and a generator to be operated during emergencies and routine maintenance. The air emissions will meet federal guidelines. The existing environment surrounding the subject property is partially developed, with overhead utility lines and poles. According to the applicant, the property is densely forested with very tall trees that will mask much of the view of the lower part of the tower, the tower will be painted to blend with the surrounding area, and no lighting is proposed for the

tower. The applicant provided a photo simulation of the proposed site from four points along the highway looking makai. The applicant notes that a 'monopine' tower design has not been considered because the branches on a 150' monopine are very heavy, making it difficult to comply with the County's structural/wind requirements without having to design a massive pole and foundation.

PUBLIC UTILITIES AND SERVICES

19. **Roadway Access:** Access to the property will be via an existing 480-foot-long, approximately 16-foot-wide compacted dirt access road from Pāhoa Kalapana Road. The access road is gated near Pāhoa Kalapana Road and will be used for construction traffic and for periodic equipment/tower maintenance.
20. **Water:** Water is not required for the proposed use.
21. **Wastewater:** This use will not generate wastewater.
22. **Utilities:** Electrical and telephone services are available to the site.
23. **Police/Fire Services:** The nearest Police and Fire facilities are located in nearby Pāhoa town.

AGENCY COMMENTS

24. **State of Hawaii Department of Health: (PD Exhibit 2 – September 26, 2024 Memo).**
25. **Police Department: (PD Exhibit 3 – September 27, 2024 Letter).**

AGENCY - NO RESPONSE

26. Department of Public Works – Engineering, Civil Defense, Fire Department, Department of Land and Natural Resources.

PUBLIC COMMENTS

27. The Planning Department has not received any comments from the public since the application was submitted.

USE PERMIT APPLICATION

COUNTY OF HAWAI'I
PLANNING COMMISSION

(Type or legibly print the requested information)

APPLICANT(S): Renegade Towers LLC

APPLICANT'S SIGNATURE: _____ DATE: _____

ADDRESS: 6710 Elverton, Oakland CA 94611

LIST APPLICANT'S INTEREST (if not owner): _____

PHONE: (Bus.) 415-609-0099 (Res.) _____ (Email) michael@vistatowers.net

REQUEST: to allow the development of a multi carrier telecommunication facility.

TAX MAP KEY(S): (3) 1-2-7-34 ZONING: A-20A

SIZE OF PROPERTY / AREA OF REQUESTED USE: 32.721 acres /

LANDOWNER(S): Renegade Towers LLC

FEE SIMPLE LANDOWNER(S) WRITTEN AUTHORIZATION
(may be provided by letter with the below statement included):

_____
Michael Miller (Nov 16, 2023 15:37 PST)

_____ DATE: _____

AGENT: Danette Martin

AGENT ADDRESS: 76-6357 Kololia Street, Kailua Kona, HI 96740

PHONE: (Bus.) 808-895-3569 (Res.) _____ (Email) danette@martinpacific.com

Please indicate to whom original correspondence and copies should be sent.

ORIGINAL: _____ COPIES: _____

Planning Dept.
Exhibit 1

USE PERMIT

PROPERTY:

TMK (3) 1-2-007:034

ADDRESS: 12-4375 Pahoa Kalapana Road, Pahoa, HI 96778

AREA: 15,423 s.f on 32.7210 acres

APPLICANT: RENEGADE TOWERS LLC

OWNER: RENEGADE TOWERS LLC

AGENT: DANETTE MARTIN, (808) 895-3569

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"This is a ~~broadband~~ related permit issued pursuant to section 46-89, Hawaii Revised Statutes."

INTRODUCTION

The Applicant, Renegade Towers LLC ("Renegade Towers) is requesting a Use Permit to allow the development of an unoccupied Multi-Carrier Telecommunications Facility. The proposed Telecommunication Facility consists of 2,880 s.f. equipment space and 12,543 s.f. existing access road on 32.7210 acres. The total area for this requested use is 15,423 s.f. The Applicant is proposing a 150' monopole with equipment for its anchor tenant Verizon Wireless which includes equipment cabinets, utility h-frame and diesel emergency generator. The facility will be completely enclosed by a 6' fence in the County's Agriculture 1-acre zone district ("the Project").

Renegade Towers owns, operates and develops towers specifically for the wireless community. Renegade Towers has principles and dedicated consultants in Hawaii, Oregon, California and Nevada.

WRITTEN STATEMENT

1. DETAILED WRITTEN DESCRIPTION OF THE PROPOSED USE, A STATEMENT OF OBJECTIVES AND REASONS FOR THE REQUEST, INCLUDING HOURS OF OPERATION AND NUMBER OF EMPLOYEES/CLIENTELE.

The Applicant proposes an unoccupied Multi-Carrier Telecommunication Facility on these 32,7210 acres of land at 12-4375 Pahoa Kalapana Road, Pahoa, Hawaii 96778. TMK (3) 1-2-007:034 in the County's Agriculture 3-acre zone district ("the Facility"). The proposed Facility is 36' x 80' or 2,880 s.f. with an access road 16' wide and approximately 12,543 s.f. The proposed will occupy a total of 15,423 s.f. The remainder of the property will be left vacant with its current landscape to mitigate any aesthetic concerns. The remainder of the property might be used for agricultural purposes sometime in the distant future. The objective is to improve the existing cell phone coverage surrounding the tower location, along Pahoa Kalapana Road.

The subject property is more than 32 acres located east of Pahoa-Kalapana Road, between mile maker 17 and 18, and is zoned A-3A. The Hawaii County's zoning code permits telecommunications in the A-20 zoned district if a Use Permit is obtained for such use.

The Applicant proposes the use of a 150' monopole painted to blend with the surrounding area. The Applicant is proposing to paint the monopole a color to blend with the tall trees fronting the road. Dunn-Edwards Shaker Gray (DE6231) is used in the photo simulations attached. The property is densely forested with very tall trees that will mask much of the view of the lower part of the tower. A monopine has not been considered because the branches on a 150' monopine are very heavy, making it difficult to comply with the County's structural/wind requirements without having to design a massive pole and foundation. It should be noted that several monopoles have been previously approved in more visible areas, for example the closest tower to the proposed site on TMK (3) 1-3-36-41 approved is a 150' monopole, not a monopine.

The Project will meet the minimum setback requirements of 30 feet for a freestanding pole, will be designed to meet the 2018 International Building Code, adopted by the County of Hawaii, and will have a hard survivability for sustained winds of one hundred miles per hour in accordance with Section 25-4-12, Hawaii County Code.

The anticipated noise emitted from this Project will be limited to the internal air conditioner necessary to maintain the correct temperature and humidity in the equipment cabinets and an emergency generator. The noise output of the air condition unit is substantially less than any number of permitted uses in the zone, such as generators, farm equipment, vehicles and farm animals.

The Project is designed to accommodate multiple carriers, consistent with the Hawaii County Planning Department policies, to avoid a proliferation of towers in the community.

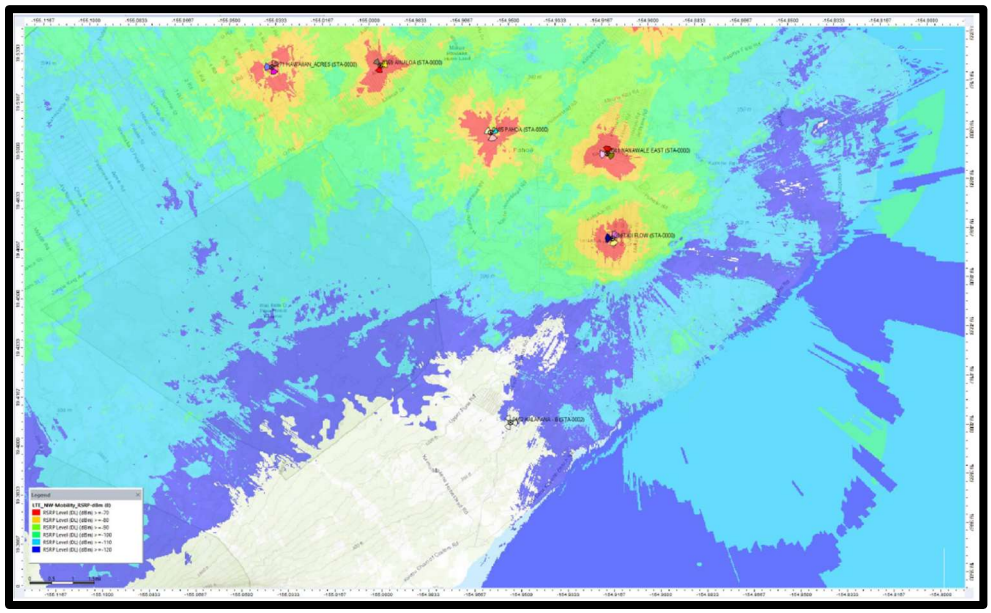
Verizon Wireless has committed to be the anchor tenant with the other carriers to follow sometime in the future.

Verizon Wireless applied for a Use Permit in 2019 (USE-19-00079) for a tower to provide similar coverage to this area. The Use Permit's approval was conditioned upon proving legal access from Highway 130. There is a paper road located behind the parcel, but the County would not authorize the improvement of the road. Verizon then worked with the Department of Transportation to obtain access directly from Highway 130. The DOT process is long with an expected cost of more than $100,000 just for the entitlement, plus the construction costs. Please see Page 32 - letter from Verizon Wireless requesting the cancellation of USE-19-00079.

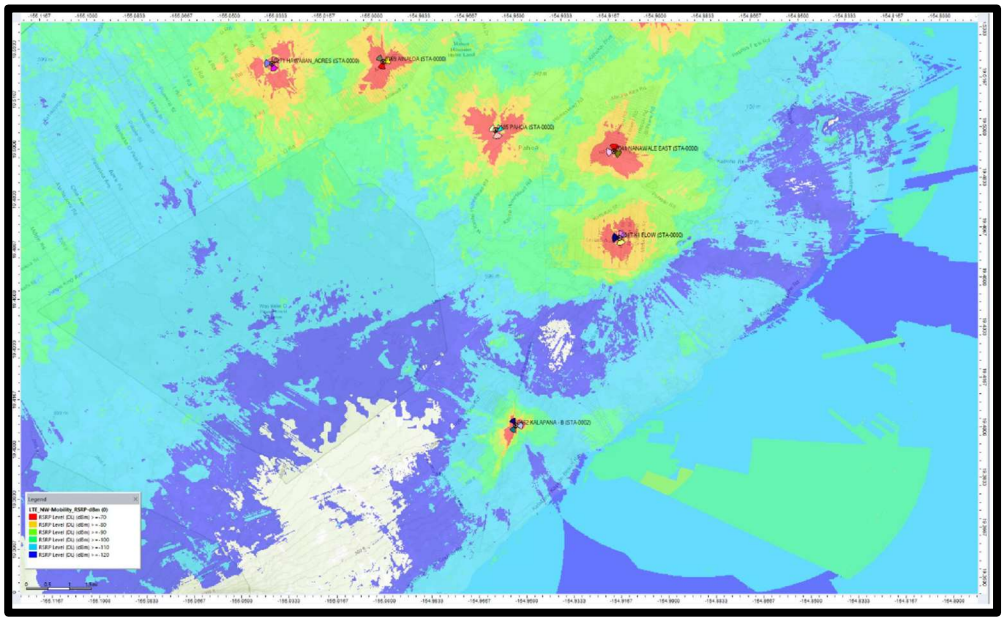
There is little to no coverage in or around the Kalapana Sea View Subdivision in Puna. Verizon Wireless and AT&T have operated temporary Cell on Wheels ("COWs") next to the Star of the Sea Painted Church across from the Noni Factory. The temporary site was placed there at the request of Civil Defense to provide service near the lava view area. The antennas only provide a small footprint of coverage. Additionally, fiber optics are not available to this area and there is not a clear microwave path to bring it to the location. The carriers only received permission to operate until the viewing area was closed. The viewing area has closed, but authorities have not forced the removal of the temporary site because of the need for service in the area. Upon construction of the proposed tower, the temporary tower will be decommissioned.

The maps below clearly show that the residents in and around Sea View Estate will finally be able to use their phones in their homes, in their yards, and in their car. EMS will be able to use their phones to call the hospital to let them know when a patient is coming to provide them expedited care when needed.

Currently, the residents must walk to or park in front of the COWs to place calls or use it for broadband services.



Without Proposed Site



With Proposed Site



[1]The lower number provides better service. Red colored areas will transmit/receive at a maximum speed; blue colored areas mean most wireless devices will be unlikely to transmit and receive service at all.

Enlarged Maps on Pages 30 and 32

This Facility is not occupied. Approximately once per month or during an emergency outage, a technician will visit the site for maintenance work. The technician's vehicle will park on the access road in front of the fenced compound.

2. DESCRIPTION OF THE SUBJECT PROPERTY IN SUFFICIENT DETAIL TO PRECISELY LOCATE THE PROPERTY. DESCRIBE EXISTING USES, STRUCTURES AND TOPOGRAPHY. IF ONLY A PORTION OF THE PROPERTY IS TO BE USED, STATE THE USE OF THE REMAINDER OF THE PROPERTY.

The proposed Facility located on a parcel east of Highway 130 / Pahoa Kalapana Road between mile markers 17 and 18, Kīkala-Kēōkea Ahupuaʻa, Puna District, Island of Hawaiʻi, Hawaiʻi.

The subject parcel had a residence constructed upon it some time ago. The County's records show a demolition permit was issued in 1994. Since then, the property remained vacant. The Applicant purchased the property from the bank last year for the purpose of developing a multiple carrier telecommunication facility. There are no plans to develop the rest of the property.

The location of the proposed tower on a large parcel far away from homes in the area. The property is lined with tall trees which will help the aesthetic view of the monopole.

3. STATE/COUNTY PLANS AFFECTING THE SUBJECT REQUEST: STATE LAND USE BOUNDARY DESIGNATION, ZONING, SPECIAL MANAGEMENT AREA AND COMMUNITY DEVELOPMENT PLANS.

State Land Use Boundary Designation. The subject property is designated as both EA (Extensive Agriculture) and IAL (Important Agricultural Lands) by the State's Land Use Boundary map. Telecommunication towers are a permitted use by the State's Land Use Ordinance.

General Plan Designation. The subject property is designated agriculture in the County's General Plan.

County Zoning Code. The subject property is situated in the County's Agricultural 3-acre (A-3A) zoned district The Zoning Code does allow Telecommunications as permitted use if a Use Permit is obtained for such use.

Community General Plan. The subject property is governed by the Puna Community Development Plan (CDP).

Surrounding Zoning. The surrounding lands A-3a (Agricultural-3 acres), FR (Forest Reserve), A-1a (Agricultural-1 acre), and A-20a (Agricultural-20 acres).

Special Management Area (SMA). The subject parcel is outside of the County's Special Management Area.

Archaeological Resources.

Ace Environmental cultural resources review and field inspection of the property. Their report dated August 1, 2023, is included with this Application. The report concluded that:

"The archival research and literature search indicate that there are no historic properties located within the 0.5 mile radius APE of the current project area. The archaeological field inspection conducted by SCS confirmed there will be no direct impact to any archaeological sites and that there will be no added indirect visual impacts to sites from the construction of the proposed cellular tower."

The State's Historical Preservation Office concurred with the determination of no historic properties affected in their letter dated August 15, 2024.

4. SURROUNDING ZONING AND LAND USES.

The surrounding properties are similarly zoned: A-3a (Agricultural-3 acres), FR (Forest Reserve), A-1a (Agricultural-1 acre), and A-20a (Agricultural-20 acres). The proposed tower is set back approximately 300' from Highway 130 from to preserve the scenic corridor. The lot is heavily wooded, hiding the bottom half of the tower with the existing trees. There is a six-lot subdivision located south of the subject property. The closest home in that subdivision to the tower is more than 450 ft. away.

5. FLOOD INSURANCE RATE MAP (FIRM) DESIGNATION

State of Hawaii, Department of Land and Natural Resources, Flood Hazard Assessment Tool determined that the FIRM designation is "X" - Areas determined to be outside 500-year floodplain determined to be outside the 1% and 0.2% annual chance floodplains.

6. FLORAL AND FAUNA RESOURCES

The general area is currently characterized by a disturbed ʻōhiʻa lehua Forest.
The project area is populated by two ʻōhiʻa lehua (*Metrosideros polymorpha*) trees, up to 50 feet in height, scattered sparsely with a variety of dominant non-native tree and shrub species. Soils are classified as Hakuma highly organic hydrous loam [662] (USDA 2024). Uneven pāhoehoe flows covered with organic material and an abundance of cobbles, stones, and boulders scattered along the access road and project site were observed.

7. DESCRIPTION OF ACCESS(S) IN THE AREA (E.G. WIDTH, TYPE OF SURFACE AND CONDITION OF ROADWAY). IF A PRIVATE ROADWAY, SUBMIT EVIDENCE OF ACCESS RIGHTS

The access road from Highway 130 exists as shown on the Topographical Survey provided by Independent Hawaii Surveyors (included in as the second page of the drawings submitted herewith).

8. TRAFFIC IMPACTS – ASSESSMENT OF EXISTING TRAFFIC CONDITIONS, ANTICIPATED INCREASE IN TRAFFIC AND TRAFFIC IMPACTS FROM PROPOSED USE (A FORMAL STUDY MAY BE REQUESTED BY DEPARTMENT OF PUBLIC WORKS OR DEPARTMENT OF TRANSPORTATION DURING THE REVIEW PROCESS)

A traffic study was not performed for this Project, as this is not an occupied-type facility. Only service personnel who must visit the location on an as needed basis will have access to the facility. Construction traffic will be limited to delivering of material and construction workers to construct the telecommunication facility. The time period will be approximately 6 weeks from the date of construction

start. Parking for the maintenance vehicle is provided within the Property in front of the fenced compound on the existing dirt road.

9. AVAILABILITY OF UTILITIES: WATER, TELEPHONE, ELECTRICITY, SEWAGE DISPOSAL

Water and sewage disposal will not be required for this Facility because it will not be occupied-type Facility. Electricity is readily available on power poles lining Highway 130. The Applicant has not yet discovered if fiber optics are available to this neighborhood. If fiber optics are not available or cost prohibitive, a microwave dish will be installed by the carrier(s) on the tower to bring such service.

10.

A. WRITTEN DESCRIPTION OF HOW THE REQUEST MEETS WITH THE FOLLOWING STANDARDS

The granting of the proposed use shall be consistent with the general purpose of the zoned district, the intent and purpose of the Zoning Code and the County General Plan;

Hawaii County Zoning Code, Section 25-5-72(b)(1) Permitted Uses of the Agriculture zoned district, states in part:

> "The following uses may be permitted in the A district, provided that a use permit is issued for each use:
>
> (1) Golf courses and related golf course uses, including golf course driving ranges, golf maintenance buildings and golf club houses;
>
> (2) Telecommunication antennas and Towers."

Section 25-4-12. Telecommunication antennas or towers states:

(a) A telecommunication antenna or tower shall be permitted in the V, CN CG, CV, MCX, ML, MG and CDH districts; provided that the antenna, tower, and its use are not hazardous or dangerous to the surrounding area and the director has issued plan approval for such use. A telecommunication antenna or tower may be permitted in the RS, RD, RM, RCX, RA, FA, A, IA and O districts if a use permit is obtained for such use. Where there is an existing telecommunication tower, co-location of additional antenna or equipment will be permitted provided the director has issued plan approval for such use.

(b) The minimum setbacks for a telecommunication antenna and tower are as follows:

(1) Freestanding antennas and towers supported by guy wires shall be set back from every property line a minimum of one foot for every five foot of antenna or tower height.

(2) Telecommunication antennas and towers supported by guy wires shall be set back from every property line a minimum of one foot for every one foot of antenna or tower height."

(c) The tower, together with the initial antennas or other equipment proposed to be installed thereon, shall have a hard survivability for sustained winds of at least one hundred miles per hour."

This Project is located in the A district, and accordingly requires that a Use Permit be obtained for such use. The proposed freestanding tower setback complies with the minimum setback requirement of

30' or one foot for every five foot of tower. And, the tower will be designed to meet the 2018 International Building Code, adopted by the County of Hawaii as their governing building code, and will have a hard survivability for sustained winds of one hundred miles per hour.

An analysis was conducted by Airspace Federal Airways and Airspace who determined that the 150' tower does not require FAA notice prior to construction.

The Applicant's tenants will operate only on licensed frequencies and will not interfere with the County of Hawaii radio system.

GENERAL PLAN

The General Plan states in part:

11. PUBLIC UTILTIES

11.3 Telecommunications

"11.3.1 Introduction and Analysis The telephone is an essential means of voice communication for the majority of residents in Hawaii County. However, over the last decade, the County has seen an acceleration in the development of telecommunication technology and a transformation of the telecommunications industry. In addition to traditional phone communication, the telecommunications industry now includes technologies such as wireless cellular and digital mobile phones, the internet and world wide web. During the last decade, wireless telecommunications has experienced a dramatic decrease in cost and a phenomenal increase in availability. Changes in technology and competition in the industry have made wireless communication more affordable to the general public. The wired infrastructure that was once used to connect a telephone to the phone system has evolved to include the world wide web and internet. The world wide web and internet uses the telephone infrastructure to transfer digital data from one computer to another. Thus, everything from simple text messages to high level banking and commerce transactions can be conducted almost instantaneously. In the near future, the changes in technology and the wireless industry may make wireless access to the internet more widely affordable and/or available. As of August 7, 1998, the entire island of Hawaii had 100 per cent digital switching. Digital switching is significant because it enables the existing telephone infrastructure to accommodate high-speed data transfers and access to many of the latest telecommunication services and features. Currently, every region on the island has access to phone service. In 1998, the last rural areas restricted to party line service were upgraded with additional telephone cables allowing single line services island wide. Advances in fiber optic technology provide the backbone for the island's high-capacity broadband requirements and the necessary services for specialized users such as the telescopes atop Mauna Kea. Furthermore, frame relay, Asynchronous Transfer Mode (ATM) and internet services are transmitted via Verizon Hawaii's fiber optic network. Currently, high speed internet connections such as Digital Subscriber Lines (DSL) are only available in certain areas on the island. However, these services are bound to expand. Advances in telecommunications are not without cost or concerns. One such concern is the construction and location of telecommunication towers. Telecommunication towers are the physical structures to which antennas are attached to facilitate wireless communication. Because of the need for a clear line-of-site, telecommunication towers are usually located in areas with minimum obstructions between the tower and its area of service. Line-of-site refers to the imaginary line between a mobile phone antenna and a telecommunication tower. If there are impediments between the mobile phone antenna and the telecommunication tower, there may be signal degradation or signal loss. For

example, the loss of line-of-sight occurs when a person uses a mobile phone while driving through a tunnel. Most often, communication is lost or unclear. The line-of-sight requirement often necessitates the conspicuous location of many telecommunication towers. Consequently, the telecommunications tower is usually much taller than the surrounding structures or vegetation and may negatively impact the scenic nature of a given area. Currently there are over 95,000 switched telephone connections in service on the island. The State Public Utilities Commission regulates telephone service statewide.

11.3.2 Policies (a) Encourage underground telephone lines where they are economically and technically feasible. (b) Work with the telecommunications industry to increase the availability of emergency telephones throughout the island. (c) Develop standards for the construction of wireless telecommunication facilities. (d) Work closely with the telephone company to provide all users with efficient service.

11.3.3 Standard (a) In the development and placement of telephone facilities, such as lines, telecommunications and cellular towers, poles, and substations, the design of the facilities shall consider the existing environment, and scenic view and vistas shall be considered and preserved where possible."

This application is consistent with the intent and purpose of the County's Zoning Code and General Plan.

"**3-15 PUNA COMMUNITY DEVELOPMENT PLAN**

3.4.3 Actions

a. Develop permanent fire stations at Hawaiian Beaches/Shores, Hawaiian Paradise Park, lower Volcano, and Mountain View, with emergency paramedical services. See, also, Section 3.3.3, Action a, relating to emergency medical facilities.

b. Provide additional volunteer fire stations and expanded programs for training community emergency/readiness volunteers in all large subdivisions as suitable sites become available and the growth in the subdivision warrants.

c. Promote free wireless internet services to Puna's subdivisions, starting with those that lack cable service. Refer to Section 4.1 for related discussion and Action c.

d. Provide more emergency call boxes along State highways.

e. Encourage enhancement of cell phone service to expand coverage to more remote areas.

f. Boost the Department of Environmental Management (DEM) recycling budget to develop an economy and to create more jobs related to recycling.

g. Increase County resources to handle the abandoned/derelict car removal program.

h. Provide public financial support for the development of utility and potable water connections, and wastewater treatment facilities, within approved village/town centers where they are desired by residents or needed to support planned and approved development." Emphasis added.

B. THE GRANTING OF THE PROPOSED USE SHALL NOT BE MATERIALLY DETRIMENTAL TO THE PUBLIC WELFARE NOR CAUSE SUBSTANTIAL ADVERSE IMPACT TO THE COMMUNITY'S CHARACTER OR TO THE SURROUNDING PROPERTIES

(a) The Project Enhances the Public Welfare

The proposed Facility improves and broadens communications access for a larger number of residents and where there is currently NO service. The ability for area residents to have access to the internet will permit children and students of all ages to easily obtain and submit information for educational purposes, and individuals will be provided the opportunity to easily transact business locally, statewide, nationally, and internationally from their homes. The Facility will also provide E911 emergency service. Quality telephone and broadband communications clearly enhances the public's welfare.

(b) The Project does not Adversely Affect the Surrounding Property

RF Emissions: The operation of the antenna does not present health hazards or cause interference with other electronic appliances and equipment. Section 704 of the Telecommunications Act of 1996 (47 U.S.C. 332(c), as amended) recognizes the absence of health hazards from wireless radio wave transmissions and prohibits local authorities from regulating the placement of such towers based on environmental effects, as long as those towers comply with the Federal Communication Commission's guidelines. The Project will be designed to strictly comply with those guidelines. A copy of the FCC Consumer Facts – Human Exposure to Radio Frequency Fields: Guidelines for Cellular & PCS Sites is attached as Pages 20 and 21.

Noise Impacts: The only source of noise that may be emitted from the Project results from an air conditioner necessary to maintain correct temperature and humidity in the equipment cabinets and a generator to be operated during emergencies and routine maintenance. The resulting noise from the air conditioner is virtually inaudible from farther than 100 feet except under extraordinarily quiet conditions, and the occasional use of a generator during maintenance or power outages is not a substantial negative impact in this area.

Visual Impacts: Pursuant to the standards set forth in the General Plan, "In the development and placement of telephone facilities, such as lines, telecommunications and cellular towers, poles, and substations, the design of the facilities shall consider the existing environment, and scenic view and vistas shall be considered and preserved where possible" The existing environment surrounding the Property is mostly undeveloped lands with few homes located more than more than 500 ft away from the tower. The tower will be painted a color that will blend with the surrounding community. The tower will be surrounded by the tall trees to minimize any impact to the surrounding community. Photo simulations of the tower very various locations are attached as Pages 22-26.

C. THE GRANTING OF THE PROPOSED USE SHALL NOT UNREASONABLY BURDEN PUBLIC AGENCIES TO PROVIDE ROADS AND STREETS, SEWERS, WATER, DRAINAGE, SCHOOL IMPROVEMENTS, POLICE AND FIRE PROTECTION AND OTHER RELATED INFRASTUCTURE

Only electrical and fiber optics are required for the proposed use. Electricity is located on the overhead utility poles are located on Highway 130. Unless it is cost prohibitive, Verizon Wireless will attempt to bring fiber optics to this neighborhood as an added benefit. No public expenditures for road, street, sewer, water, drainage, or schools or increased police or fire protection are required. The Project enhances police and fire protection by affording wireless voice and data services to remote land areas so that emergency and crime-fighting officials can be contacted in the event of an emergency.

TELECOMMUNICATION TOWERS

ATTACHMENT TO SPECIAL PERMIT OR USE PERMIT APPLICATIONS

In addition to the requirements for submitting a Special Permit or Use Permit Application, please provide the following additional information when applying for a telecommunication tower:

1. **What is your schematic plan for tower development on the Big Island? Provide a map and written description of these sites. Justify how this particular subject site plays an integral part in this overall plan.**

   Verizon Wireless prepared a schematic map showing the existing coverage without the proposed Facility and the coverage expected with the new Facility. The maps clearly shows that the proposed Facility will provide solid coverage in and around the proposed Facility as well as extending coverage along Highway 130 and as far as Sea View Estates subdivision. This Facility will provide E911 services in areas that currently have little or no coverage. Full-sized maps are on Pages 17 to 19.

2. **Building plans for the tower, certified by a structural engineer licensed in the State of Hawaii, verifying that the tower, together with initial antennas and other equipment proposed to be installed thereon for co-location, are structurally sound and wind resistant.**

   Christopher P. Sekol, a structural engineer licensed in the State of Hawaii, provided a letter dated September 28, 2023 states that: "DaVinci Engineering intends to design this 150-ft monopole to withstand the basic wind speed of 139 Vmph per the ANSI/TIA-222-H. The wind speed is a design within the specifications for limit-state as defined by the Load and Resistance Factor Design (LRFD) methodology." The letter is attached to this report as Page 27 and 28.

3. **A design plan for the tower and appurtenant structures, including discussion on tower selection and antennas, visual impacts, color, lighting, landscaping and safety.**

   The Applicant proposes the use of a 150' monopole painted to blend with the surrounding area. The monopole will be painted a color that will blend with the surroundings. Dunn-Edwards Shaker Gray (DE6231) is proposed by the Applicant and used in the photo simulations of the tower attached. The property along Highway 130 is lined with very tall trees, providing the best visual mitigation for this area. A monopine aka faux tree pole is not proposed for this location. The tower is too tall for the weight of the branches. That type of tower is cost prohibitive because of the large foundation and stout monopole required to meet the County's wind speed requirement. The existing trees and other foliage will minimize the visual impact. Only the top of the tower will be visible at a distance. Lighting is not proposed on the tower. Security lighting mounted somewhere near the ground equipment will comply with the County of Hawaii Lighting Ordinance.

   Photo simulations of the monopole created using 3 different vantage points. In these simulations, Dunn-Edwards Shaker Gray (DE6231) is used. Another option would be to paint the monopole a brownish green color to match the trees. The simulation taken from the closest vantage point is shown on the following page. Please see the others photo simulations on Pages 22 to 26.



4. **A statement from the applicant that the request complies with the Federal Aviation Administration that the application has not been found to be a hazard to air navigation**.

   The FAA Notice Criteria Tool was used to determine if notice was required by the FAA. The site is not near an airport and does not require FAA notice. See the report on attached Page 29.

5. **A statement from the applicant that the request complies with the regulations of the Federal Communications Commission, including requirements on radio frequency emissions, or a statement that no such compliance is necessary.**

   The Applicant is a tower infrastructure company and is not required to be licensed by the Federal Communications Commission. As an infrastructure company, it does not operate the antennas and equipment. The tenants are required to operate on licensed frequencies and abide by all rules and regulations related to their licensed frequencies/operation.

6. **A statement from the applicant that the proposed use will not interfere with the County of Hawaii public safety radio system.**

   The Applicant will not operate the radio equipment. However, its tenants are required to operate on licensed frequencies and may not interfere with the County's public safety radio system. The tenants are required to operate on licensed frequencies and abide by all rules and regulations related to their licensed frequencies/operation.

7. **A statement from the applicant that space on the tower for co-location of antennas or attachments will be made available to other providers, if this can be done without substantial interference to the applicant's use of the tower. If you are an infrastructure company, a commitment from a minimum of two service providers shall be identified in the application.**

   Verizon Wireless has committed to locate on the tower. AT&T and T-Mobile have expressed a strong interest in collocating on the tower. T-Mobile standard antenna array is shown on the drawings. The Applicant will make this tower available to any carrier licensed in this market by the FCC.

8. A statement from the applicant that diligent, but unsuccessful efforts to install or colocate the applicant's telecommunication antennas on existing towers or feasible antenna support structures have been made. Identify those sites that you have investigated and explain how those sites are inadequate and how the site selected is the least obtrusive.

There are no towers or tall buildings in this area that would provide enough height to mount antennas to cover the target area. This proposed tower will complement the existing coverage by expanding the coverage footprint as seen on the propagation maps prepared by Verizon Wireless and submitted herewith.

9. Provide justification for the height of the proposed tower by including propagation maps for the coverage area at proposed height and at a lower height if the proposed tower is more than 100-feet tall. If the site involves increasing the height of an existing tower, provide propagation maps to show analysis of signal quality at the existing and proposed height.

Wireless antennas are generally located at or near the top of towers, water tanks, or buildings. The electromagnetic energy emitted from the antennas lose power rapidly the farther you get from the transmission point. This requires the position of the monopoles and antennas at strategic points in an area to obtain the largest coverage with the minimal antennas to ensure the highest level of quality service.

In general, the antennas must have line of sight to its intended coverage area. Topography and tall trees are the main factor in establishing the necessary height needed for the antennas. The antennas cannot be too tall because it would cause interference at existing sites. The antennas cannot be too short because they wouldn't provide the necessary coverage.

The radio frequency engineers at Verizon Wireless propagated the expected coverage taking into account the many factors including the location of existing sites, topography, trees, etc. The results are provided in the schematic maps provided on Pages 17 to 19.

The propagation maps shows coverage along Highway 130 and reaching as far as Sea View Estates subdivision where there is no current service.

If the tower's height would be reduced, it would reduce the coverage footprint for future colocators who will be eventually install their antennas below the height proposed for Verizon Wireless.

10. Have you met with adjacent landowners and/or community regarding the development? Provide information regarding those meetings.

No meetings were held concerning this proposed location. During the Verizon Wireless' application for a tower nearby, many residents sent letters of support demanding cell phone service.

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Coverage Plots
Proposed cell site - Kalapana

Need - Expand Service to unserved areas

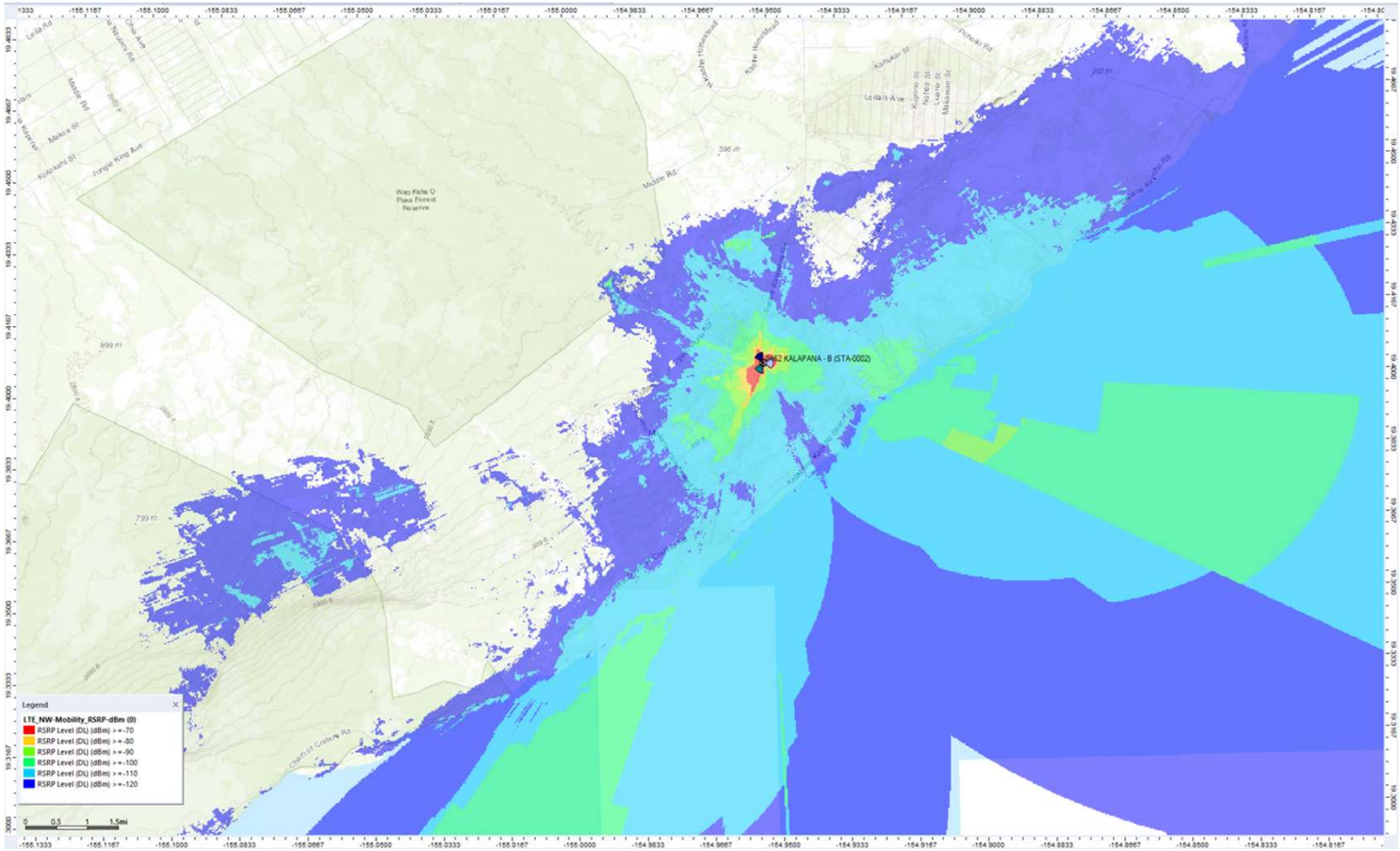
VERIZON Network Performance, PNW - Hawaii

11/7/2023

Kalapana 700 LTE Coverage

Power on proposed site only

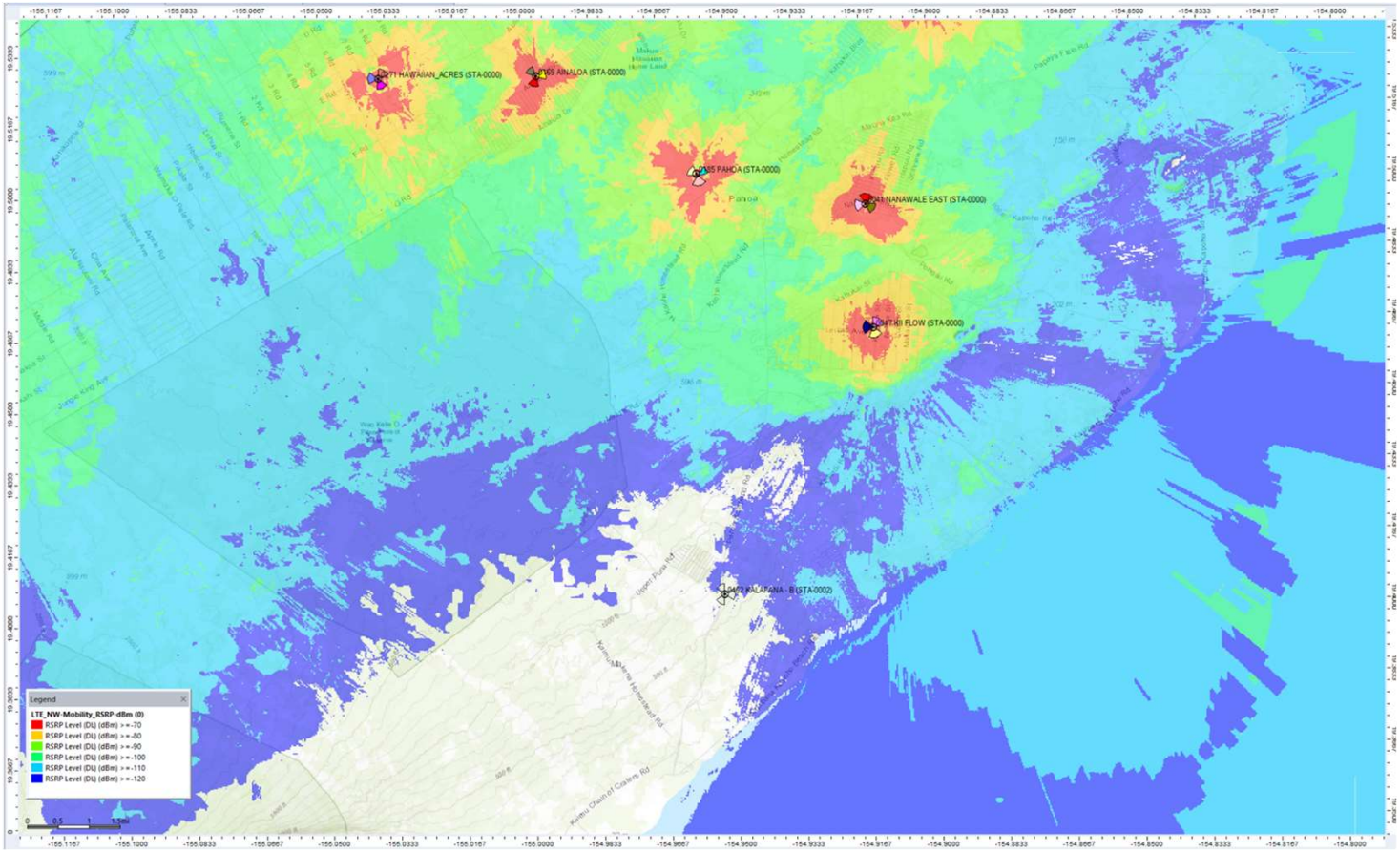
700 LTE provides largest coverage area



Verizon confidential and proprietary. Unauthorized disclosure, reproduction or other use prohibited.

Kalapana Area Coverage with all Verizon on-air sites Today

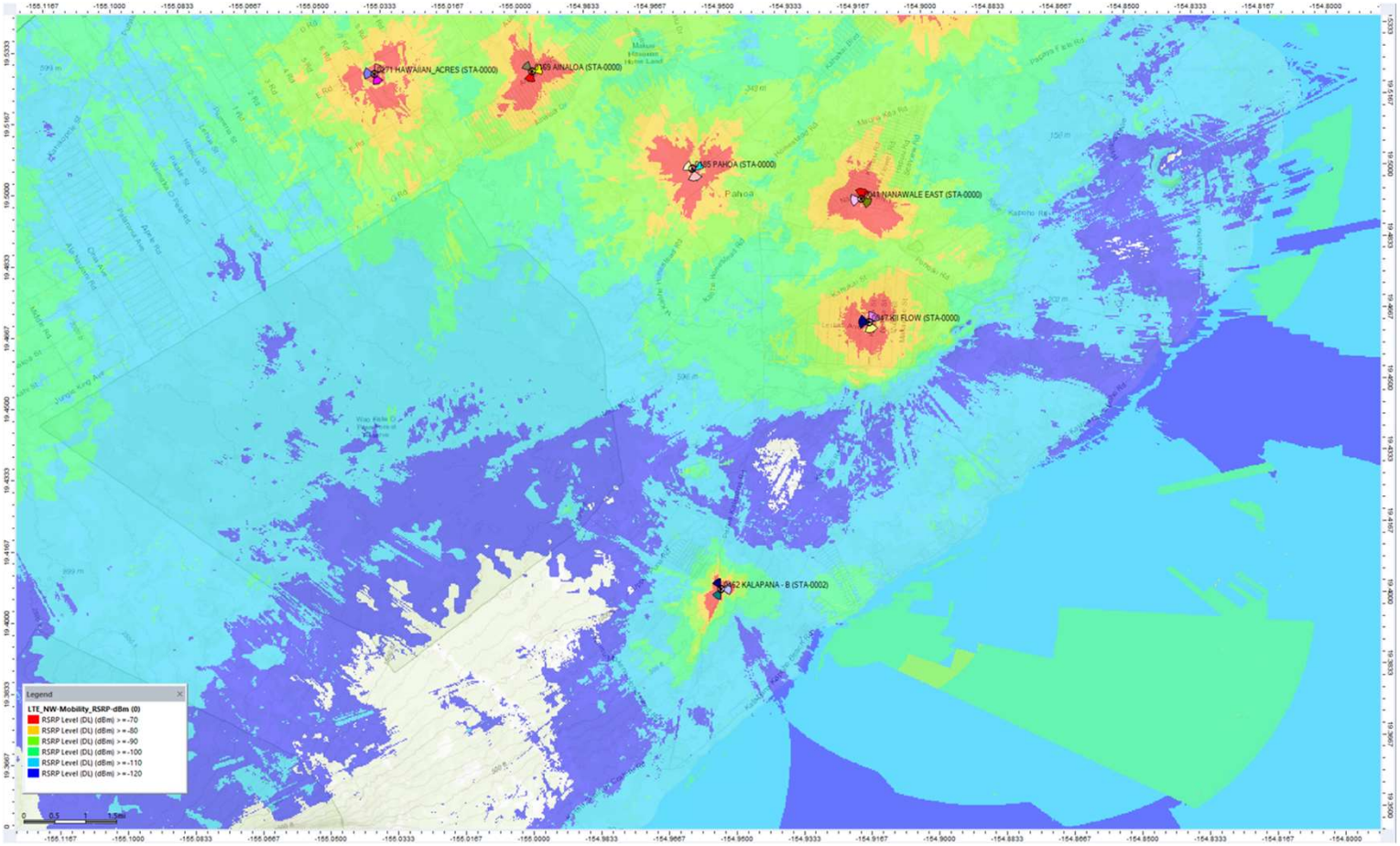
700 LTE Coverage



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Kalapana Area Coverage with all Verizon on-air sites & Proposed Kalapana Site

700 LTE Coverage



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Human Exposure To Radio Frequency Fields: Guidelines For Cellular & PCS Sites

FCC Consumer Facts

Background

Primary antennas for transmitting wireless telephone service, including cellular and Personal Communications Service (PCS), are usually located outdoors on towers, water tanks and other elevated structures like rooftops and sides of buildings. The combination of antenna towers and associated electronic equipment is referred to as a "cellular or PCS cell site" or "base station." Cellular or PCS cell site towers are typically 50-200 feet high. Antennas are usually arranged in groups of three, with one antenna in each group used to transmit signals to mobile units, and the other two antennas used to receive signals from mobile units.

At a cell site, the total radio frequency (RF) power that can be transmitted from each transmitting antenna depends on the number of radio channels (transmitters) that have been authorized by the Federal Communications Commission (FCC) and the power of each transmitter. Although the FCC permits an effective radiated power (ERP) of up to 500 watts per channel (depending on the tower height), the majority of cellular or PCS cell sites in urban and suburban areas operate at an ERP of 100 watts per channel or less.

An ERP of 100 watts corresponds to an actual radiated power of 5-10 watts, depending on the type of antenna used. In urban areas, cell sites commonly emit an ERP of 10 watts per channel or less. For PCS cell sites, even lower ERPs are typical. As with all forms of electromagnetic energy, the power density from a cellular or PCS transmitter rapidly decreases as distance from the antenna increases.

Background (cont'd.)

Consequently, normal ground-level exposure is much less than the exposure that might be encountered if one were very close to the antenna and in its main transmitted beam. Measurements made near typical cellular and PCS cell sites have shown that ground-level power densities are well below the exposure limits recommended by RF/microwave safety standards used by the FCC.

Guidelines

In 1996, the FCC adopted updated guidelines for evaluating human exposure to RF fields from fixed transmitting antennas such as those used for cellular and PCS cell sites. The FCC's guidelines are identical to those recommended by the National Council on Radiation Protection and Measurements (NCRP), a non-profit corporation chartered by Congress to develop information and recommendations concerning radiation protection. The FCC's guidelines also resemble the 1992 guidelines recommended by the Institute of Electrical and Electronics Engineers (IEEE), a non-profit technical and professional engineering society, and endorsed by the American National Standards Institute (ANSI), a nonprofit, privately-funded membership organization that coordinates development of voluntary national standards in the United States.

(More) →

Federal Communications Commission ▪ Consumer & Governmental Affairs Bureau ▪ 445 12th St., SW ▪ Washington, DC 20554
1-888-CALL-FCC (1-888-225-5322) ▪ TTY: 1-888-TELL-FCC (1-888-835-5322) ▪ Fax: 1-866-418-0232 ▪ www.fcc.gov/cgb

Guidelines (cont'd.)

In the case of cellular and PCS cell site transmitters, the FCC's RF exposure guidelines recommend a maximum permissible exposure level to the general public of approximately 580 microwatts per square centimeter. This limit is many times greater than RF levels typically found near the base of cellular or PCS cell site towers or in the vicinity of other, lower-powered cell site transmitters.

Calculations corresponding to a "worst-case" situation (all transmitters operating simultaneously and continuously at the maximum licensed power) show that, in order to be exposed to RF levels near the FCC's guidelines, an individual would essentially have to remain in the main transmitting beam and within a few feet of the antenna for several minutes or longer. Thus, the possibility that a member of the general public could be exposed to RF levels in excess of the FCC guidelines is extremely remote.

When cellular and PCS antennas are mounted on rooftops, RF emissions could exceed higher than desirable guideline levels on the rooftop itself, even though rooftop antennas usually operate at lower power levels than free-standing power antennas. Such levels might become an issue for maintenance or other personnel working on the rooftop. Exposures exceeding the guidelines levels, however, are only likely to be encountered very close to, and directly in front of, the antennas. In such cases, precautions such as time limits can avoid exposure in excess of the guidelines. Individuals living or working within the building are not at risk.

For More Information

For more information on RF exposure, you can visit the FCC's RF Safety website at **www.fcc.gov/oet/rfsafety**. For further information about this issue or any other telecommunications-related issues, visit the FCC's Consumer & Governmental Affairs Bureau website at **www.fcc.gov/consumer-governmental-affairs-bureau**, or contact the FCC's Consumer Center by calling 1-888-CALL-FCC (1-888-225-5322) voice or 1-888-TELL-FCC (1-888-835-5322) TTY; faxing 1-866-418-0232; or writing to:

Federal Communications Commission
Consumer & Governmental Affairs Bureau
Consumer Inquiry and Complaints Division
455 12th Street, SW
Washington, DC 20554.

###

*For this or any other consumer publication in an accessible format (electronic ASCII text, Braille, large print or audio) please write or call us at the address or phone number below, or send an email to **FCC504@fcc.gov**.*

*To receive information on this and other FCC consumer topics through the Commission's electronic subscriber service, click on **www.fcc.gov/cgb/contacts**.*

This document is for consumer education purposes only and is not intended to affect any proceeding or cases involving this subject matter or related issues.

Kalapana
12-4375 Pahoa Kalapana Road
Pahoa, HI 96778

RENEGADE TOWERS, LLC

Aerial photograph showing the viewpoints for the photosimulations.



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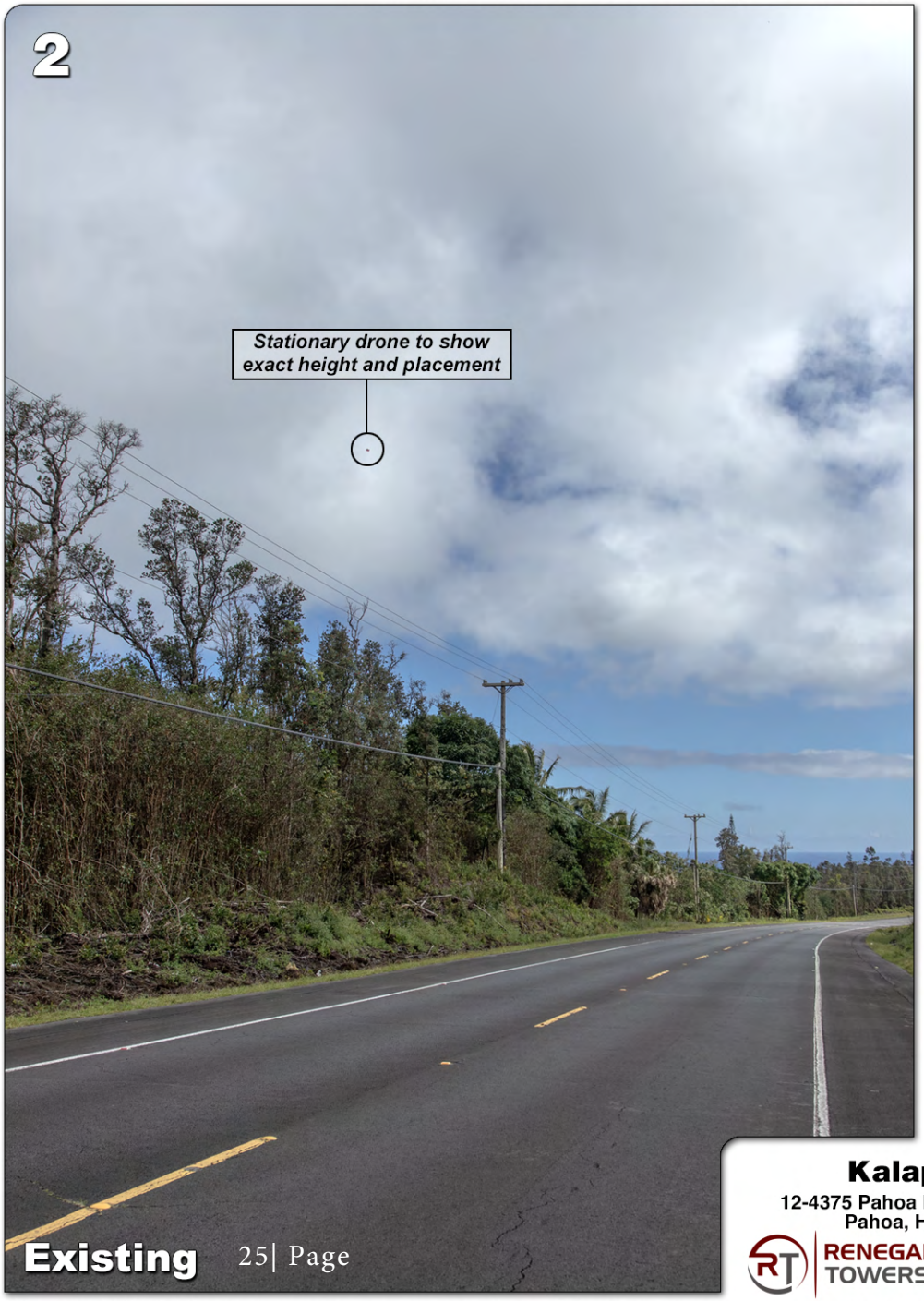
RENEGADE TOWERS, LLC

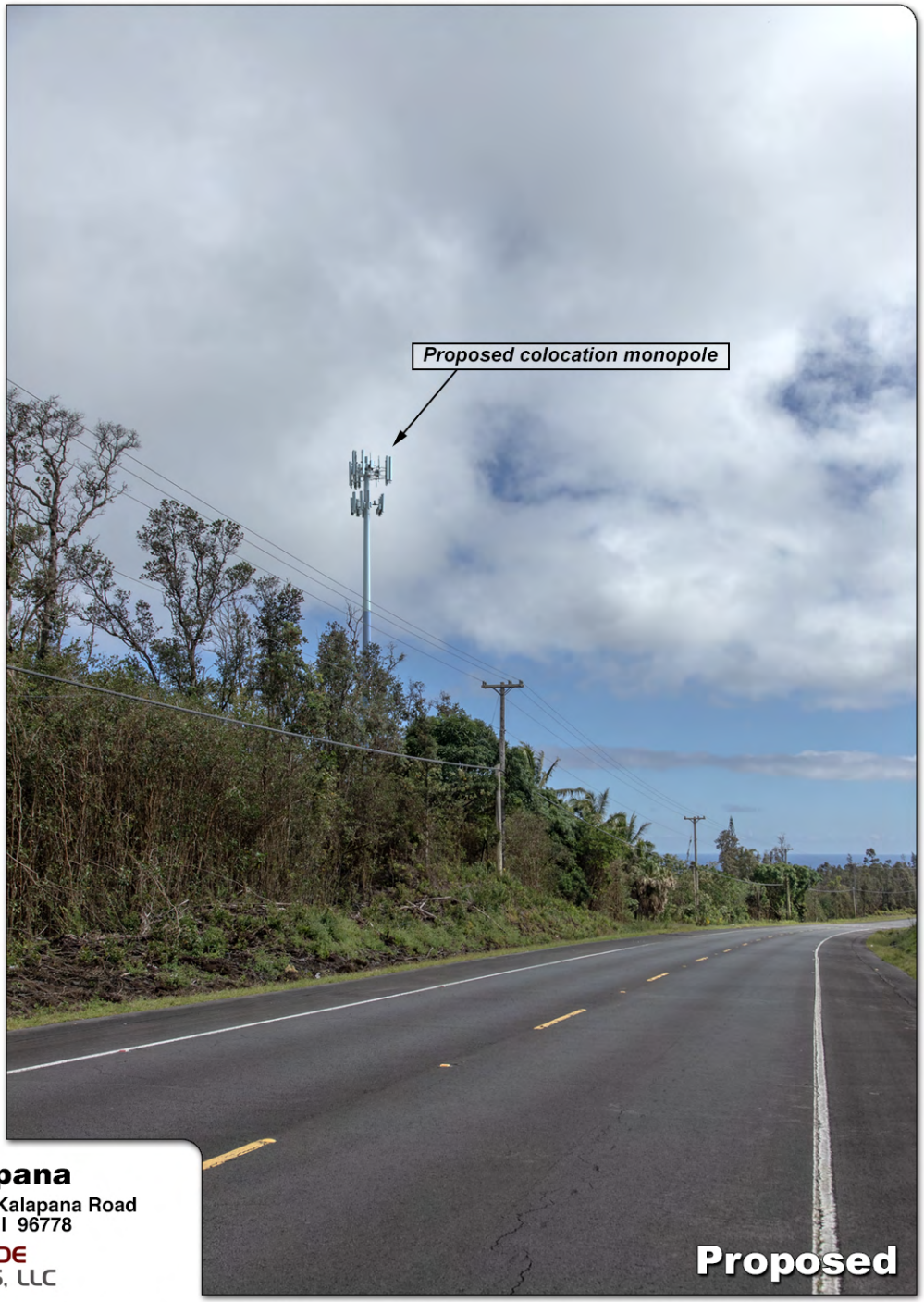
Photosimulation of the view looking south from Pahoa Kalapana Road, at the intersection with One Ele Ele Road.



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Photosimulation of the view looking southeast from the shoulder of southbound Pahoa Kalapana Road.





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Pahoa, HI 96778

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Pahoa, HI 96778

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Photosimulation of the view looking north-northeast along Pahoa Kalapana Rd at Old Kalapana Rd, the Hoonone Rd turnoff.



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4



Kalapana
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Pahoa, HI 96778

RENEGADE TOWERS, LLC

Photosimulation of the very first glimpse of the tower heading northbound along Pahoa Kalapana Road, slightly telephoto view.



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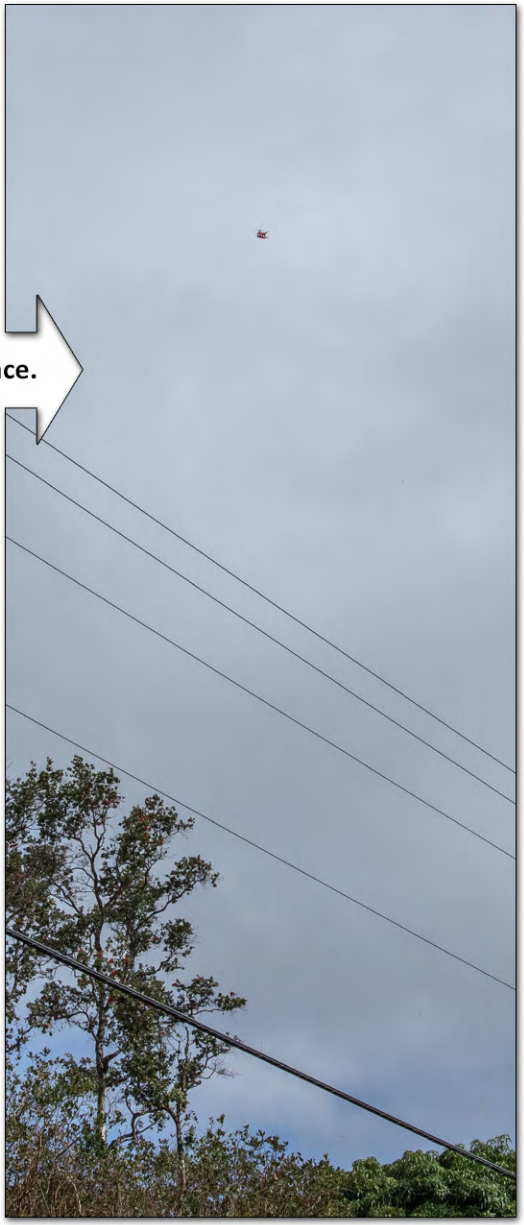
Kalapana
12-4375 Pahoa Kalapana Road
Pahoa, HI 96778

RENEGADE TOWERS, LLC



The drone used to establish exact height and placement.

Drone locked in place.



Flight controller screen during all site photography.



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DaVinci Engineering, Inc.
191 S. House Rock Dr.
Cedar City, Utah 84720

September 28, 2023

Renegade Towers, LLC
6710 Elverton Dr.
Oakland, CA 94611

Attn: Michael Miller

Re: Proposed Structural Design of 150-Ft. Monopole
12-4375 Pahoa Kalapana Rd. Hawaii Co., HI: 19° 24' 16", -154° 57' 10.2"
Renegade Towers, LLC Site Name: Kalapana
DaVinci Engineering, Inc. # 3323224-035

Mr. Miller:

DaVinci Engineering, Inc. is pleased to provide continuing engineering services through the development of the above referenced telecommunications site. DaVinci Engineering understands that there may be some concern on the part of local building officials regarding the design wind speed of 139 V_{mph} for the 150-ft Monopole. We would like to take this opportunity to discuss the required design criteria speed per the **State of Hawaii State Building Code Council which adopted the 2018 IBC w/ Amendments.**

Per section 1609.1.1 & 3108 of the 2018 International Building Code, communication structures shall be designed in accordance with the Electronic Industries Association/Telecommunications Industries Association Standards ANSI/TIA-222-H, "Structural Standards for Steel Antenna Towers and Antenna Supporting Structures". The 2018 IBC [ASCE 7-16] recommends a 139 mph V_{mph} design wind for this site location.

The TIA-222-H uses the following factors that should be considered in the design wind pressure of this monopole tower.
Structure Class: Used to determine the importance factor for the structure based on the hazard to human life, property damage, and the necessity of essential services.
Exposure Category: An exposure category that adequately reflects the characteristics of ground surface irregularities at the site shall be determined. Account shall be taken of variations in ground surface roughness that arise from natural topography and vegetation as well as from constructed features.
Topographic Category: A factor to consider wind speed-up at isolated hills, ridges and escarpments constituting abrupt changes in the general topography.
Wind Speed: The basic wind speed and ice thickness shall be at a minimum per the IBC/ ASCE 7-16 wind maps and shall be considered to come from any horizontal direction.
Gust Effect Factors: Factors that account for the effects of wind gusting and the calculated response of a monopole type structure.

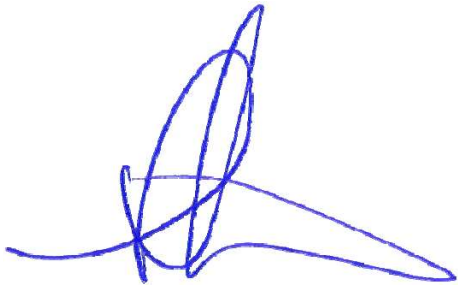
Load Combinations: Used to determine the "timing" or combinations of loads on the structure at the same time per the 2018 IBC section 1605.

The specific factors used for this site are as follows:
Structure Class: Importance factor = 1.0
Exposure Category: Category C
Topographic Category: Category #1
Wind Speed: 139 V_{mph}
Gust Effect Factors: 1.1 per ANSI/TIA-222-H for monopole structures
Governing Load Combinations: 1.2DL + 1.0WL & 0.9DL + 1.0WL

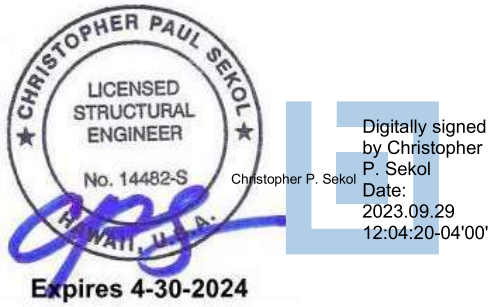
DaVinci Engineering intends to design this 150-ft monopole to withstand a basic wind speed of 139 V_{mph} per the ANSI/TIA-222-H. The wind speed is a design wind speed, which means that the structure will safely withstand the full design wind speed within the specifications for limit-state as defined by the Load and Resistance Factor Design (LRFD) methodology.

We hope this review of the tower design criteria has given you a greater degree of comfort regarding the design capacity inherent in telecommunication structures. I have specialized in the design of telecommunication structures for over 25 years. If you have any additional questions please call me direct at (805) 922-5221.

Sincerely,
DaVinci Engineering, Inc.



Simon W. Leland, P.E.
Director of Engineering
simon.leland@davinci-engineering.com



Christopher P. Sekol
Engineer of Record

Federal Aviation Administration

Notice Criteria Tool

Notice Criteria Tool - Desk Reference Guide V_2018.2.0

The requirements for filing with the Federal Aviation Administration for proposed structures vary based on a number of factors: height, proximity to an airport, location, and frequencies emitted from the structure, etc. For more details, please reference CFR Title 14 Part 77.9.

You must file with the FAA at least 45 days prior to construction if:

- your structure will exceed 200ft above ground level
- your structure will be in proximity to an airport and will exceed the slope ratio
- your structure involves construction of a traverseway (i.e. highway, railroad, waterway etc...) and once adjusted upward with the appropriate vertical distance would exceed a standard of 77.9(a) or (b)
- your structure will emit frequencies, and does not meet the conditions of the FAA Co-location Policy
- your structure will be in an instrument approach area and might exceed part 77 Subpart C
- your proposed structure will be in proximity to a navigation facility and may impact the assurance of navigation signal reception
- your structure will be on an airport or heliport
- filing has been requested by the FAA

If you require additional information regarding the filing requirements for your structure, please identify and contact the appropriate FAA representative using the Air Traffic Areas of Responsibility map for Off Airport construction, or contact the FAA Airports Region / District Office for On Airport construction.

The tool below will assist in applying Part 77 Notice Criteria.

* **Structure Type:**	POLE | Monopole Please select structure type and complete location point information.
Latitude:	19 Deg 24 M 16 S N
Longitude:	154 Deg 57 M 10.2 S W
Horizontal Datum:	NAD83
Site Elevation (SE):	600 (nearest foot)
Structure Height :	150 (nearest foot)
Is structure on airport:	(●) No ( ) Yes

Results

You do not exceed Notice Criteria.

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

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA

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

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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

STATE OF HAWAII | KA MOKUʻĀINA ʻO HAWAIʻI
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA ʻOIHANA KUMUWAIWAI ʻĀINA

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD, STE 555
KAPOLEI, HAWAII 96707

August 31, 2023

IN REPLY REFER TO:
Project No.: 2023PR00936
Doc. No.: 2308NM05
Archaeology

Kerry N. Willoughby, CEM
ACE Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178
kerrywilloughby@aceenvironmentalllc.com

Steven Pause, Director
County of Hawaii
Department of Public Works
101 Pauahi Street, Suite 7
Hilo, HI 96720
public_works@hawaiicounty.gov

Dear Kerry N. Willoughby and Steven Pause:

SUBJECT: **Chapter 6E42 and National Historic Preservation Act Section 106 Review –**
FCC Tower Construction Notification – TCNS ID 267116
Project Name/Number – Kalapana
12-4375 Pahoa Kalapana Road Pahoa – Construction of Telecommunications Facility
Kīkala 1-2, Kēōkea Ahupuaʻa, Puna District, Island of Hawaiʻi
TMK: (3) 1-2-007:034

This letter provides the State Historic Preservation Division's (SHPD's) review of the Federal Communications Commission (FCC) Tower Construction Notification received from ACE Environmental LLC (ACE), on behalf of Renegade Towers. The project is subject to historic preservation review in accordance with HRS §6E-42 and Section 106 of the National Historic Preservation Act (NHPA). The SHPD received this submittal on August 2, 2023 (initial documents) and August 29, 2023 (additional information), which included the following:

[X] Letter dated August 28, 2023, from ACE requesting historic preservation review and the State Historic Preservation Officer's (SHPO's) concurrence with a project effect determination of *no historic properties affected* on behalf of Renegade Towers. and the FCC;
[X] FCC Form 620;
[X] Construction plans, photographs, and other supporting documentation
[X] Cultural Resources Report titled *Cultural Resources Review and Field Inspection, Renegade Towers LLC Site Kalapana 12-4375 Pahoa Kalapana Rd. Pahoam Hawaii County, HI 96778* (Escott 2023)

ACE determined that this project is an undertaking as defined in 36 CFR 800.16(y) and that the HRS 6E project area/federal area of potential effects (APE) are synonymous and comprise a 10,569-sq.-ft. portion of the parcel. The subject parcel is currently owned by Renegade Towers, LLC. The applicant proposes to grub and grade for a cell tower facility pad and the construction of a cell tower facility within an 80 ft. by 36 ft. area.

A review of SHPD records indicates that no archaeological inventory survey has been completed for the subject property. The subject parcel is located in a relatively undeveloped area although the parcel itself had three buildings on it and was

used for small scale farming. No historic properties have been previously identified within the project area/APE or nearby. area.

Scientific Consultant Services, Inc. (Escott 2023) conducted a records search and a field inspection of the subject property. No historic properties were identified within the project area/APE or within a 0.5-mile surrounding area. Thus, no significant historic properties will be impacted by the proposed project.

Based on the scope, and findings, the SHPD's determination is "No historic properties affected" pursuant to HAR §13-284-7(a)(1), for the current project.

The SHPO concurs with a project effect determination of *no historic properties affected* pursuant to 36 CFR 800.4(d)(1).

SHPD hereby notifies ACE (on behalf of the FCC) and the County of Hawai'i that the permit issuance process may continue.

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) 933-7651.

ACE and FCC are the offices of record for this undertaking. Please maintain a copy of this letter with your environmental review record.

The cultural resources report serves to facilitate project planning and supports the historic preservation review process. **Please send** one hard copy of the document, clearly labeled Library Copy, along with a text-searchable PDF copy of the document and a copy of this letter to the SHPD Kapolei office, Attn. SHPD Library and one hard copy of the document, clearly marked Library Copy, and a copy of this acceptance letter to the Hilo SHPD office, attention Sean Nāleimaile. Additionally, please upload a text-searchable PDF copy of the report to HICRIS Project 2023PR00936 using the Project Supplement option, and a PDF copy of the report to lehua.k.soares@hawaii.gov

Please contact Nicole A. Mello, Hawai'i Island Archaeologist IV, at Nicole.Mello@hawaii.gov for any questions or concerns regarding this letter.

Aloha, *Alan Downer*

Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

GENERAL DYNAMICS

November 15, 2023

Planning Department
County of Hawaii
101 Pauahi Street, Suite 3
Hilo, Hawaii 96720

RE: USE PERMIT NO. USE 19-00079
APPLICANT: Cellco Partnership dba Verizon Wireless
Permitted Use: Allows a 155-Foot Tall, Non-Manned Monopine Telecommunication Facility
TMK: 1-2-007:081

Verizon Wireless received conditional approval to construct a 155-foot tall monopine on a portion of the above-mentioned property.

Condition No. 2, requires "Prior to submittal of an application for Plan Approval, the applicant, successors or assigns shall provide evidence of legal access from Highway 130 to the subject parcel."
-
Verizon researched the access issue. It was determined that the property was landlocked. The adjacent property owners were not in favor of this location for the tower and refused to provide an access easement.

Verizon also requested that the County construct the paper road to the owner's and applicant's use. Unfortunately, the County does not have funding that could pay for the improvement.

The State's Department of Transportation might allow access off on Highway 130, however, the process is long and expected to costs hundreds of thousands of dollars, just for the road.

Renegade Towers has agreed to construct a tower for Verizon's use at another location that will provide the necessary coverage.
-
It is for that reason that Verizon is requesting that the Use Permit issued above be voided. If you have any questions, please feel free to contact me at 808-895-3569.

Sincerely,

Danette Martin

Danette Martin
Consultant to Verizon Wireless

cc: Renegade Towers

HAWAII ONE CALL CENTER
www.callbeforeyoudig.org
811 or 1-866-423-7287
AT LEAST TWO DAYS
BEFORE YOU DIG

RENEGADE TOWERS, LLC

SITE NAME: KALAPANA
12-4375 PAHOA KALAPANA RD
PAHOA, HI 96778
TMK: (3) 1-2-007:034

SPECIAL INSPECTIONS

SPECIAL INSPECTIONS WILL BE REQUIRED AS PART OF THIS PROJECT'S SCOPE OF WORK

ZONING DRAWINGS

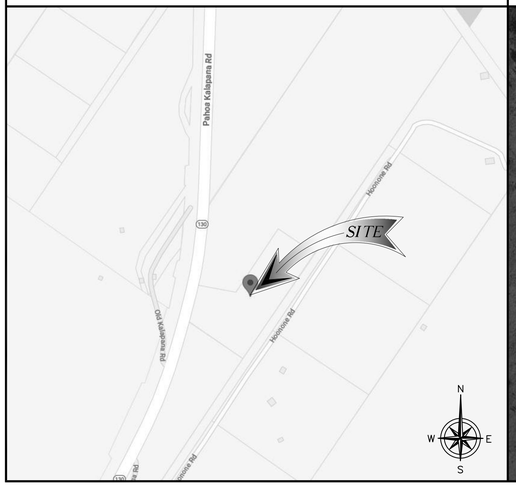
IF USING 11"X17" PLOT,
DRAWINGS WILL BE HALF SCALE

SITE INFORMATION

PROPERTY OWNER:	RENEGADE TOWERS, LLC 6710 ELVERTON DRIVE OAKLAND, CA 94611
APPLICANT: ADDRESS:	RENEGADE TOWERS, LLC 6710 ELVERTON DRIVE OAKLAND, CA 94611
LATITUDE:	19.403992/19°24'14.4"N
LONGITUDE:	-154.952039/154°57'07.3"W
LAT/LONG TYPE:	N/A
GROUND ELEVATION:	±589.45' A.M.S.L.
JURISDICTION:	HAWAII COUNTY, HAWAII
ZONING:	TBD
OCCUPANCY:	U
CONSTRUCTION TYPE:	II-B
STATE LAND USE:	TBD
TMK:	(3) 1-2-007:034
HEIGHT LIMIT:	TBD
SETBACKS:	TBD
FLOOD ZONE:	ZONE "X"
POWER:	HECO
TELCO:	TBD

LOCATION MAP

VICINITY MAP



LOCAL MAP



DRAWING INDEX

SHEET NUMBER:	SHEET DESCRIPTION		
0T01	TITLE SHEET	A03	EQUIPMENT & ANTENNA LAYOUTS
TS01	TOPOGRAPHIC SURVEY	A04	ELEVATION
A01	OVERALL SITE PLAN	A05	ELEVATION
A02	ENLARGED SITE PLAN		

PROJECT DESCRIPTION

RENEGADE TOWERS PROPOSES TO BUILD A COLOCATABLE UNMANNED WIRELESS TELECOMMUNICATIONS FACILITY. THE SCOPE OF WORK WILL CONSIST OF THE FOLLOWING:

GENERAL

- INSTALL (24) PROPOSED ±8'-0" PANEL ANTENNAS ON PROPOSED MONOPOLE.
- INSTALL (24) PROPOSED RRUs BEHIND PROPOSED PANEL ANTENNAS.
- INSTALL (6) PROPOSED OVP SURGE SUPPRESSORS MOUNTED ON PROPOSED T-ARM STANDOFFS.
- INSTALL (4) PROPOSED EQUIPMENT CABINETS MOUNTED ON PROPOSED CONCRETE PADS AT PROPOSED GROUND EQUIPMENT AREA.
- INSTALL (2) PROPOSED EMERGENCY GENERATORS MOUNTED ON PROPOSED CONCRETE PADS AT PROPOSED GROUND EQUIPMENT AREA.
- INSTALL (2) PROPOSED GPS ANTENNAS MOUNTED ON PROPOSED H-FRAMES.
- INSTALL (2) PROPOSED 4'-0" MW DISH ANTENNAS MOUNTED ON PROPOSED MONOPOLE.

TOWER STRUCTURE

- INSTALL (1) PROPOSED 150'-0" HIGH PRE-ENGINEERED STEEL MONOPOLE TOWER.
- INSTALL (2) PROPOSED TRI-SECTOR MOUNT ASSEMBLIES ON MONOPOLE.

H-FRAME

- CONTRACTOR TO INSTALL (2) PROPOSED GPS ANTENNAS, (1) PROPOSED FIBER DISTRIBUTION BOX, (2) PROPOSED AUTOMATIC TRANSFER SWITCHES, AND (2) PROPOSED ILC CABINETS ON (2) PROPOSED H-FRAMES AT PROPOSED GROUND EQUIPMENT AREAS. ALL PROPOSED EQUIPMENT AND PROPOSED H-FRAMES PER CARRIER

GROUND EQUIPMENT ENCLOSURE

- (1) PROPOSED CHAIN LINK FENCE ENCLOSURE W/ PRIVACY SLATS WITHIN PROPOSED 80'-0" X 36'-0" EQUIPMENT SPACE AT GROUND LEVEL.
- (4) PROPOSED WORK LIGHTS AT PROPOSED H-FRAME POSTS.

CONDUITS

- (1) PROPOSED POWER CONDUIT RUN FROM PROPOSED P.O.C. TO PROPOSED 600AMP TRI-METER BANK TO CARRIER PPC CABINET AT GROUND EQUIPMENT AREA. INSTALLED BY CONTRACTOR. UTILITY TO PROVIDE POWER TO METER.
- (2) PROPOSED TELCO CONDUITS RUN FROM PROPOSED CARRIERS P.O.C. TO CARRIER TELCO CABINET AT GROUND EQUIPMENT AREA.
- (6) PROPOSED HYBRID CABLE CONDUITS FROM PROPOSED FIBER DISTRIBUTION CABINET AT PROPOSED EQUIPMENT AREAS TO PROPOSED ANTENNAS ON PROPOSED MONOPOLE.

POWER

- (1) PROPOSED 600A TRI-METER SOCKET AND (1) PROPOSED SPLICE CAN PROVIDED BY CARRIER AND INSTALLED BY CONTRACTOR PER HAWAIIAN ELECTRIC ESIM AND NEC REQUIREMENTS.
- AT TIME OF INSTALLATION, CONTRACTOR TO PROVIDE AND INSTALL METER SOCKET COVER (PLASTIC).

SITE DIRECTIONS

FROM: HILO INTERNATIONAL AIRPORT (ITO) 2450 KEKUANAOA, HILO, HI 96720 US

- HEAD WEST ON AIRPORT RD/KEKUANAOA ST
- TURN LEFT ONTO HI-11/HAWAI'I BELT RD/KANOELEHUA AVE
- TURN LEFT INTO HI-130/KEAAU PAHOA BYPASS RD
- TURN LEFT ONTO ACCESS ROAD APPROXIMATELY HALF A MILE PAST ONE ELE ELE RD
- TURN LEFT ONTO DIRT ACCESS PATH PAST ACCESS GATE
- SITE WILL BE ON THE LEFT

APPLICABLE CODES

ALL WORK AND MATERIALS SHALL BE PERFORMED AND INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNING AUTHORITIES.

- IBC-2018, INTERNATIONAL BUILDING CODE
  ALL CONSTRUCTION SHALL CONFORM TO THE 2018 INTERNATIONAL BUILDING CODE (2018 IBC) AND THE LATEST CITY AND HAWAII COUNTY AMENDMENTS, AND ORDINANCES.
- NEC-2020, NATIONAL ELECTRICAL CODE
- IECC-2018, ENERGY CODE COMPLIANCE STATEMENT
- NFPA-2018, NATIONAL FIRE PROTECTION ASSOCIATION
  FIRE SAFETY DURING CONSTRUCTION, ALTERATION OR DEMOLITION SHALL COMPLY WITH 2018 NFPA 1
- 2018 INTERNATIONAL ENERGY CONSERVATION CODE
- A.D.A. COMPLIANCE
  INSTALLATION IS UNMANNED AND NOT FOR HUMAN HABITATION. HANDICAP ACCESS IS NOT REQUIRED PER A.D.A.

PROJECT TEAM

A&E:
M SQUARED WIRELESS
1387 CALLE AVANZADO
SAN CLEMENTE, CA 92673
CONTACT: JON MAXWELL
PHONE: (949) 391-6824

SITE ACQUISITION:
DANETTE MARTIN
73-6357 KOLOLIA STREET,
KAILUA-KONA, HAWAII 96740
PHONE: (808) 895-3569
EMAIL: danette@martinpacific.com

APPLICANT/TOWER OWNER:
RENEGADE TOWERS, LLC
6710 ELVERTON DRIVE
OAKLAND, CA 94611
ATTN:MICHAEL MILLER
PH: (415) 609-0099
EMAIL: michael@vistatowers.net

ZONING REPRESENTATIVE:
DANETTE MARTIN
73-6357 KOLOLIA STREET,
KAILUA-KONA, HAWAII 96740
PHONE: (808) 895-3569
EMAIL: danette@martinpacific.com

RENEGADE TOWERS, LLC
6710 ELVERTON DRIVE
OAKLAND, CA 94611

PROJECT INFORMATION:

KALAPANA
RENEGADE TOWERS, LLC
12-4375 PAHOA KALAPANA RD
PAHOA, HI 96778
MONOPOLE

CURRENT ISSUE DATE:

07/01/2024

ISSUED FOR:

ZONING DRAWINGS

REV.:	DATE:	DESCRIPTION:	BY:
A	05/14/2024	90% ZDs FOR REVIEW	SP
B	05/16/2024	90% ZDs REVISED	SP
0	05/21/2024	100% ZDs	RDL
1	07/01/2024	100% ZDs-REV SURVEY	RDL
2	08/21/2024	100% ZDs-REV	SP

PLANS PREPARED BY:

M SQUARED WIRELESS
1387 CALLE AVANZADO
SAN CLEMENTE CA 92673 (949) 391-6824

DRAWN BY:	CHK.:	APV.:
SP	JM	MM

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IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.

SHEET TITLE:

TITLE SHEET

SHEET NUMBER:

0T01

TOPOGRAPHIC SURVEY OF
A PORTION LOT 12-A
PORTION OF GRANT 8897
KIKALA-KEOKEA HOMESTEADS
PUNA DISTRICT
ISLAND OF HAWAII
STATE OF HAWAII

The Independent Hawaii Surveyors, LLC

P.O. BOX 577
Hilo, HI 96721
Phone 808 959-0360
FAX 808 959-0353
info@hawaiiboundary.com

TRUE NORTH

SCALE: 1 IN. = 50 FT.

PAHOA KALAPANA RD.
No. 12-4375

RAD=3874.72'
(R)185°49'44"
CH=80.96'
(F)185°44'09"
CH=80.88'

(R)96°25'39"
10.00'
(F)96°16'26"
10.02'

RAD=3884.72'
(R)187°55'39"
CH=203.38'
(F)187°56'40"
CH=203.48'

RAD=3874.72'
(R)190°24'16"
CH=132.15'
(F)190°24'28"
CH=132.28'

(R)279°25'39"
10.00'
(F)280°37'44"
9.87'

LOT 12-A
32.721 Ac.

PROPOSED TOWER
LOCATION
N 19°24'14.76"
W 154°57'06.96"
ELEV.=580.15'

EXTENTS OF
ROADBED

ASPHALT
DRIVEWAY

GATE

EASEMENT "A"
FOR ROAD &
UTILITY PURPOSES
SEE S/D #5082

EASEMENT "B"
FOR ROAD &
UTILITY PURPOSES
SEE S/D #5082

(F)101°21'57" 278.09'
(R)101°22'54" 278.01'

(F)124°17'56" 270.11'
(R)124°17'17" 270.00'

(F)34°16'23" 468.93'
(R)34°17'17" 469.03'

586' 584' 582' 580' 578' 576' 574'

NOTES:

1. This is a topographic survey of a portion of Lot 12-A as specified by client. The elevations are orthometric heights using GEOID12B relative to a Mean Sea Level and are shown on a two foot contour interval.
2. The features shown hereon were located by an actual field survey completed on April 5, 2024.
3. Field measured dimensions (F) are within acceptable tolerances as compared to record dimensions (R) for land of this type and in this subdivision.
4. This map should not be changed, altered or used to execute any transaction or application other than that indicated on this particular "Contract".
5. This survey was performed without the benefit of a title report which may reveal encumbrances to the property not shown hereon.

LEGEND
- = PIPE FOUND
- = SPIKE FOUND
- = NAIL FOUND
- = SPIKE SET

0' 50' 100' 150'
FEET

HEATH E HUOVINEN
LICENSED PROFESSIONAL LAND SURVEYOR
No. 19368
HAWAII, U.S.A.

This work was prepared by me
or under my direct supervision

Heath E. Huovinen
Licensed Professional Land Surveyor
License Number 19368

Date: 6/5/2024
Drawing: JOB16417 TOPO REVISED.dwg
TMK: (3) 1-2-007: 034

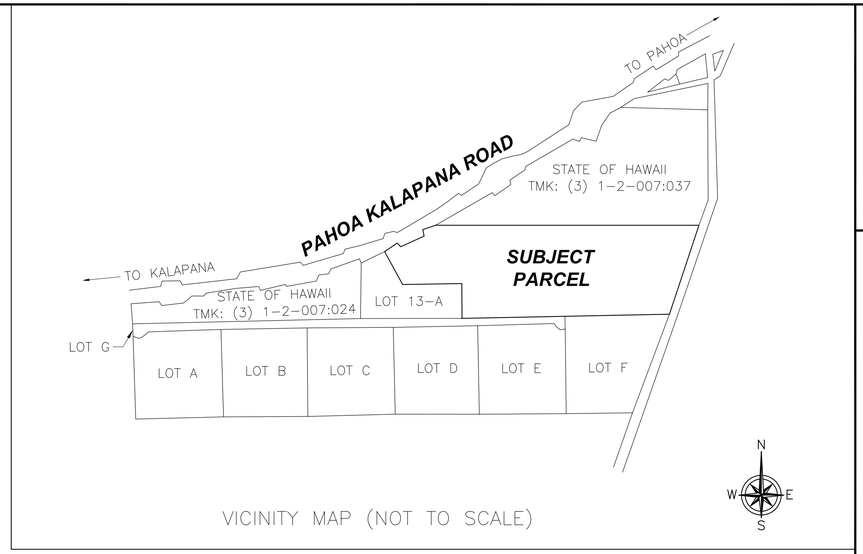
19°24'21.5" N, 154°57'2.8" W COUNTY GIS

NOTES:

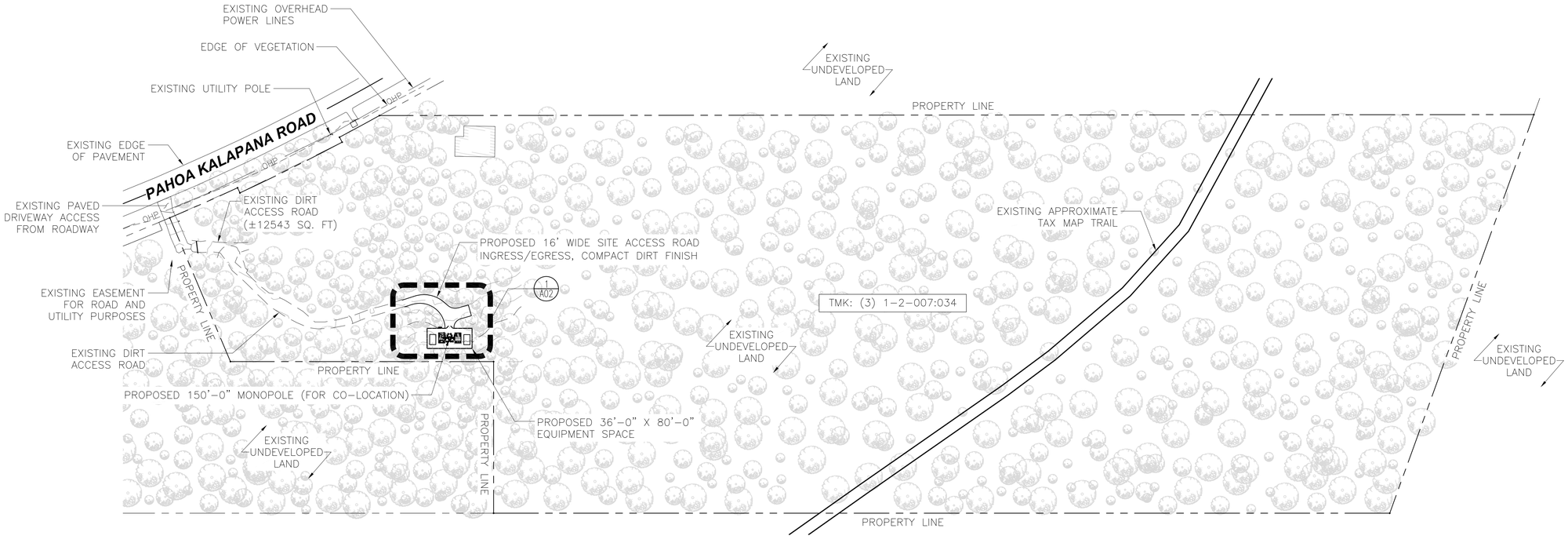
1. THE WIRELESS COMMUNICATION FACILITY COMPLIES WITH FEDERAL STANDARDS FOR RADIO FREQUENCY IN ACCORDANCE WITH THE TELECOMMUNICATION ACT OF 1996 AND SUBSEQUENT AMENDMENTS AND ANY OTHER REQUIREMENTS IMPOSED BY STATE OR FEDERAL REGULATORY AGENCIES
2. NO EXISTING PARKING STALLS ARE BEING ADDED OR REMOVED AS PART OF THE PROPOSED INSTALLATION
3. SEE ATTACHED LAND SURVEY FOR ENTIRE PROPERTY BOUNDARIES, EASEMENTS, AND CONTOUR LINES

DISCLAIMER:

THIS SET OF DRAWINGS WAS PREPARED UTILIZING INFORMATION OBTAINED FROM PUBLIC DOCUMENTS MADE AVAILABLE ON THE COUNTY OF HAWAII WEBSITE. MSQUARED WIRELESS CANNOT GUARANTEE THE ACCURACY OF THE DATA AND INFORMATION DEPICTED ON THE COUNTY OF HAWAII WEBPAGE AND HEREBY EXPRESSLY DISCLAIMS ANY RESPONSIBILITY FOR THE TRUTH, VALIDITY, INVALIDITY, ACCURACY, INACCURACY OF ANY SAID DATA AND INFORMATION. THE PARCEL LINES ON MAPS ARE FOR ILLUSTRATION PURPOSES ONLY AND ARE NOT INTENDED TO BE USED AS A SURVEY PRODUCT. USER ACCEPTS RESPONSIBILITY FOR THE UNAUTHORIZED USE OR TRANSMISSION OF ANY SUCH DATA OR INFORMATION IN ITS ACTUAL OR ALTERED FORM



VICINITY MAP (NOT TO SCALE)



OVERALL SITE PLAN

24"x36" SCALE: 1" = 100'-0"
11"x17" SCALE: 1" = 200'-0"
100' 50' 0' 100'

1

RENEGADE TOWERS, LLC
6710 ELVERTON DRIVE
OAKLAND, CA 94611

PROJECT INFORMATION:

KALAPANA
RENEGADE TOWERS, LLC
12-4375 PAHOA KALAPANA RD
PAHOA, HI 96778
MONOPOLE

CURRENT ISSUE DATE:

07/01/2024

ISSUED FOR:

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1	07/01/2024	100% ZDs-REV SURVEY	RDL
2	08/21/2024	100% ZDs-REV	SP

PLANS PREPARED BY:

M SQUARED WIRELESS
1387 CALLE AVANZADO
SAN CLEMENTE CA 92673 (949) 391-6824

DRAWN BY:	CHK.:	APV.:
SP	JM	MM

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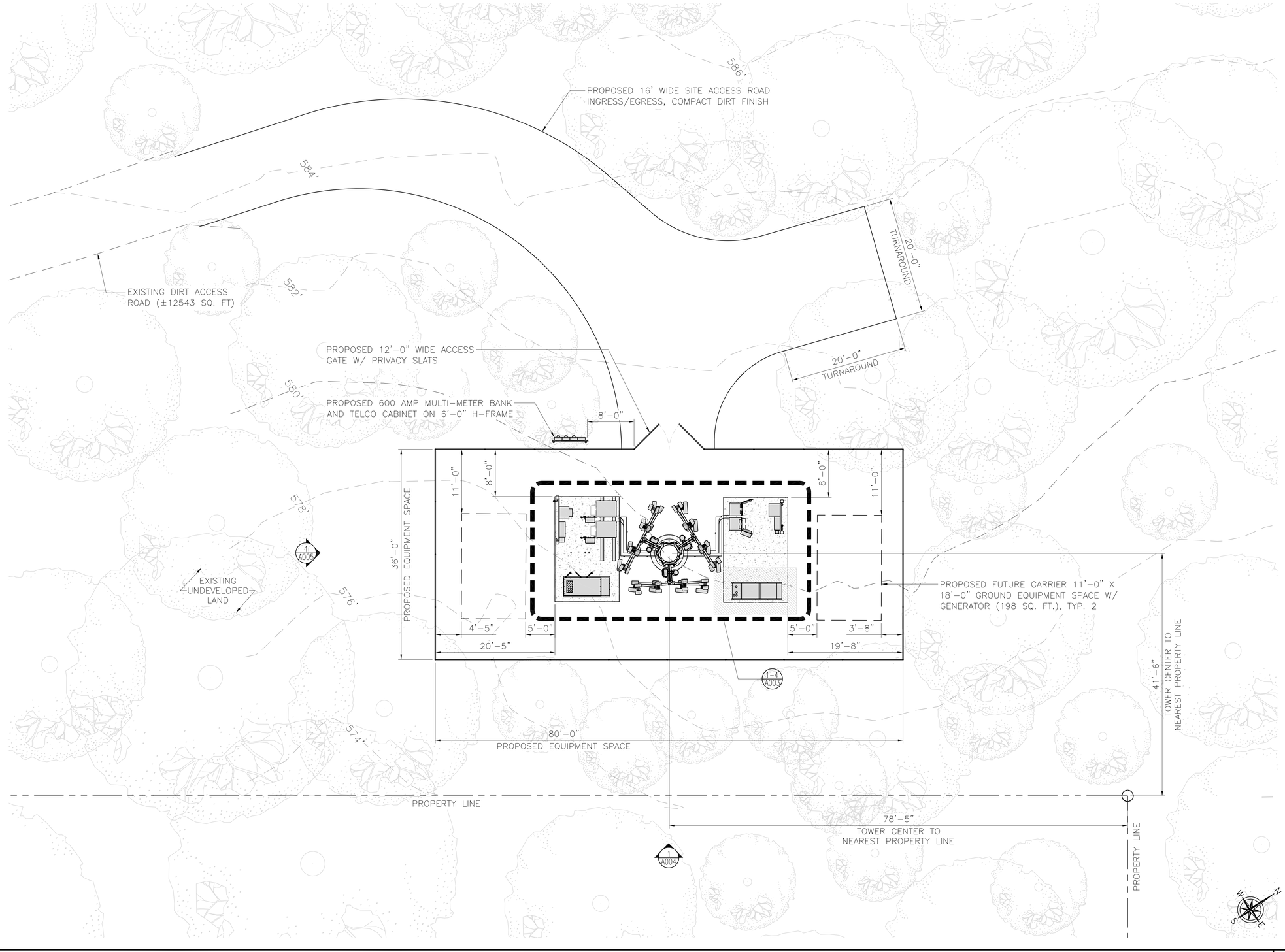
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SHEET TITLE:

OVERALL SITE PLAN

SHEET NUMBER:

A01



ENLARGED SITE PLAN

24"x36" SCALE: 1/8" = 1'-0"
11"x17" SCALE: 1/16" = 1'-0"
8' 6' 4' 2' 0' 8'

1

RENEGADE TOWERS, LLC
6710 ELVERTON DRIVE
OAKLAND, CA 94611

PROJECT INFORMATION:

KALAPANA
RENEGADE TOWERS, LLC
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SAN CLEMENTE CA 92673 (949) 391-6824

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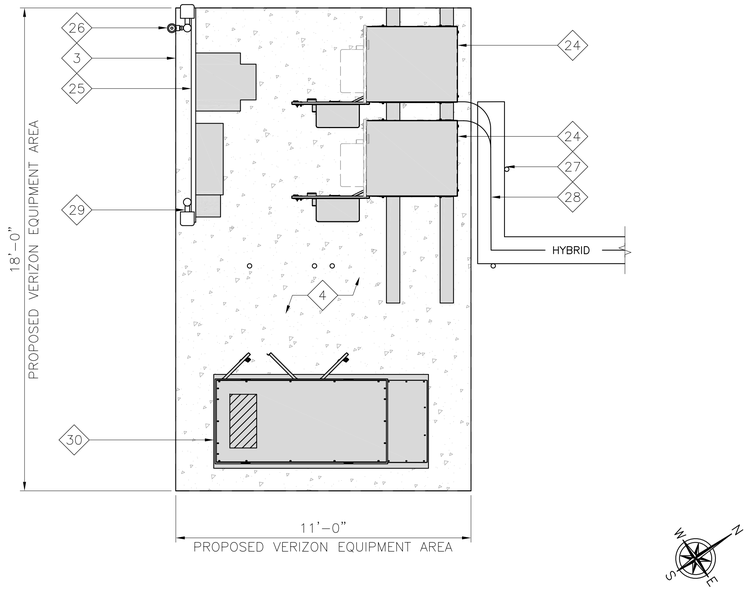
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SHEET TITLE:

ENLARGED SITE PLAN

SHEET NUMBER:

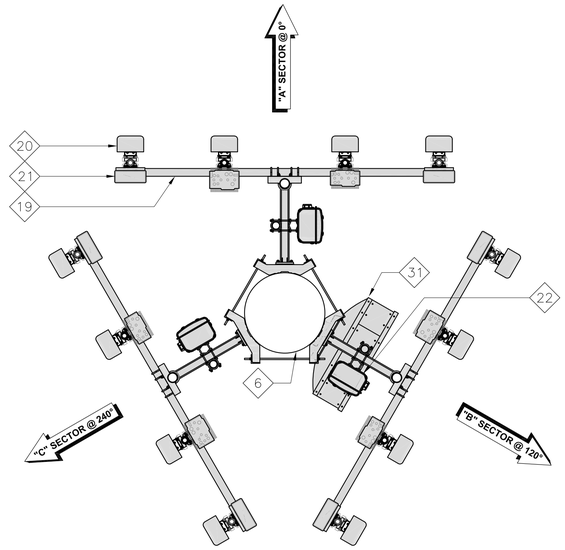
A02



PROPOSED VZW EQPT. LAYOUT

24"x36" SCALE: 3/8" = 1'-0"
11"x17" SCALE: 3/16" = 1'-0"

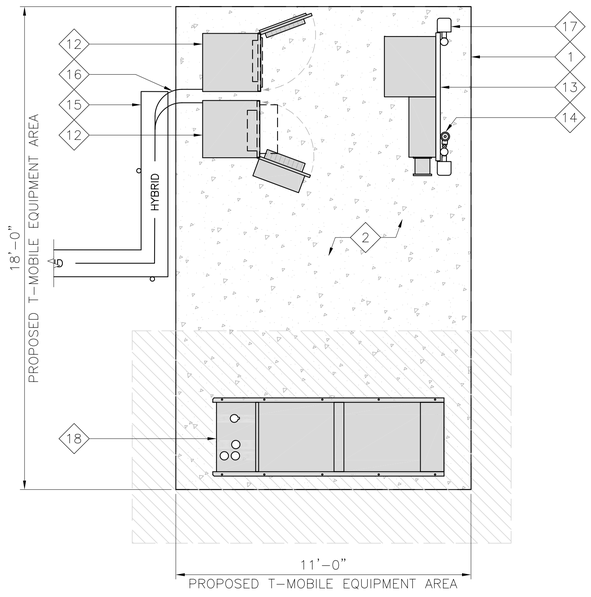
1



PROPOSED VZW ANT. LAYOUT

24"x36" SCALE: 3/8" = 1'-0"
11"x17" SCALE: 3/16" = 1'-0"

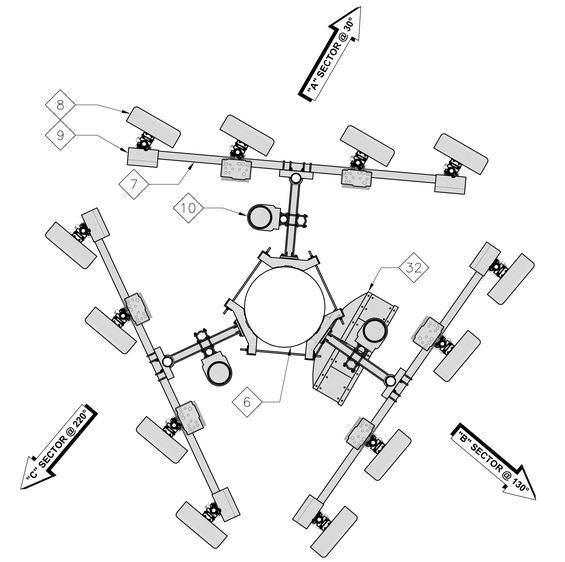
2



PROPOSED T-MO EQPT. LAYOUT

24"x36" SCALE: 3/8" = 1'-0"
11"x17" SCALE: 3/16" = 1'-0"

3



PROPOSED T-MO ANT. LAYOUT

24"x36" SCALE: 3/8" = 1'-0"
11"x17" SCALE: 3/16" = 1'-0"

4

KEYNOTES

1. PROPOSED T-MOBILE 11'-0" X 18'-0" EQUIPMENT LEASE SPACE
2. PROPOSED T-MOBILE CONCRETE EQUIPMENT PAD
3. PROPOSED VERIZON 11'-0" X 18'-0" EQUIPMENT LEASE SPACE
4. PROPOSED VERIZON CONCRETE EQUIPMENT PAD
5. NOT USED
6. PROPOSED 150'-0" HIGH MONOPOLE W/ SUBTERRANEAN FOUNDATION
7. PROPOSED T-MOBILE TRI-SECTOR T-ARM ANTENNA MOUNT
8. PROPOSED T-MOBILE 8' PANEL ANTENNA TO BE MOUNTED ON 3"ø PIPE; (4) PER SECTOR; (12) TOTAL
9. PROPOSED T-MOBILE RRU TO BE STACK MOUNTED BEHIND ANTENNA; (4) PER SECTOR; (12) TOTAL
10. PROPOSED T-MOBILE SQUID SURGE SUPPRESSOR MOUNTED ON PROPOSED T-ARM STANDOFF; (1) PER SECTOR, (3) TOTAL
11. NOT USED
12. PROPOSED T-MOBILE OUTDOOR EQUIPMENT CABINET MOUNTED ON PROPOSED CONCRETE PAD; (2) TOTAL
13. PROPOSED T-MOBILE OUTDOOR UTILITY AND EQUIPMENT ENCLOSURES SECURED TO PROPOSED H-FRAME
14. PROPOSED T-MOBILE GPS ANTENNA MOUNTED ON PROPOSED H-FRAME; (1) TOTAL
15. PROPOSED T-MOBILE ELEVATED 6'-0" TALL CABLE BRIDGE
16. PROPOSED T-MOBILE HYBRID CABLE ROUTED ALONG ELEVATED 6'-0" TALL CABLE BRIDGE AND INTO TOWER THROUGH OPEN PORT HOLE UP TO ANTENNA LEVEL (±200' TOTAL CABLE LENGTH)
17. PROPOSED T-MOBILE POST-MOUNTED WORK LIGHT; (2) TOTAL
18. PROPOSED T-MOBILE 48KW ENCLOSED EMERGENCY GENERATOR MOUNTED ON PROPOSED CONCRETE PAD
19. PROPOSED VERIZON TRI-SECTOR T-ARM ANTENNA MOUNT
20. PROPOSED VERIZON 8' PANEL ANTENNA TO BE MOUNTED ON 3"ø PIPE; (4) PER SECTOR; (12) TOTAL
21. PROPOSED VERIZON RRU TO BE MOUNTED BEHIND ANTENNA; (4) PER SECTOR; (12) TOTAL
22. PROPOSED VERIZON OVP SURGE SUPPRESSOR MOUNTED ON PROPOSED T-ARM STANDOFF; (1) PER SECTOR, (3) TOTAL
23. NOT USED
24. PROPOSED VERIZON OUTDOOR EQUIPMENT CABINET MOUNTED ON PROPOSED METAL RUNNERS SECURED TO PROPOSED CONCRETE PAD; (2) TOTAL
25. PROPOSED VERIZON OUTDOOR UTILITY AND EQUIPMENT ENCLOSURES SECURED TO (N) H-FRAME
26. PROPOSED VERIZON GPS ANTENNA MOUNTED ON PROPOSED H-FRAME; (1) TOTAL
27. PROPOSED VERIZON ELEVATED 6'-0" TALL CABLE BRIDGE
28. PROPOSED VERIZON HYBRID CABLE ROUTED ALONG ELEVATED 6'-0" TALL CABLE BRIDGE AND INTO TOWER THROUGH OPEN PORT HOLE UP TO ANTENNA LEVEL (±200' TOTAL CABLE LENGTH)
29. PROPOSED VERIZON POST-MOUNTED WORK LIGHT; (2) TOTAL
30. PROPOSED VERIZON 30KW ENCLOSED EMERGENCY GENERATOR MOUNTED ON PROPOSED CONCRETE PAD
31. PROPOSED VERIZON 4'-0" MW DISH ANTENNA
32. PROPOSED T-MOBILE 4'-0" MW DISH ANTENNA

RENEGADE TOWERS, LLC
6710 ELVERTON DRIVE
OAKLAND, CA 94611

PROJECT INFORMATION:

KALAPANA
RENEGADE TOWERS, LLC
12-4375 PAHOA KALAPANA RD
PAHOA, HI 96778
MONOPOLE

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PLANS PREPARED BY:

M SQUARED WIRELESS
1387 CALLE AVANZADO
SAN CLEMENTE CA 92673 (949) 391-6824

DRAWN BY:	CHK.:	APV.:
SP	JM	MM

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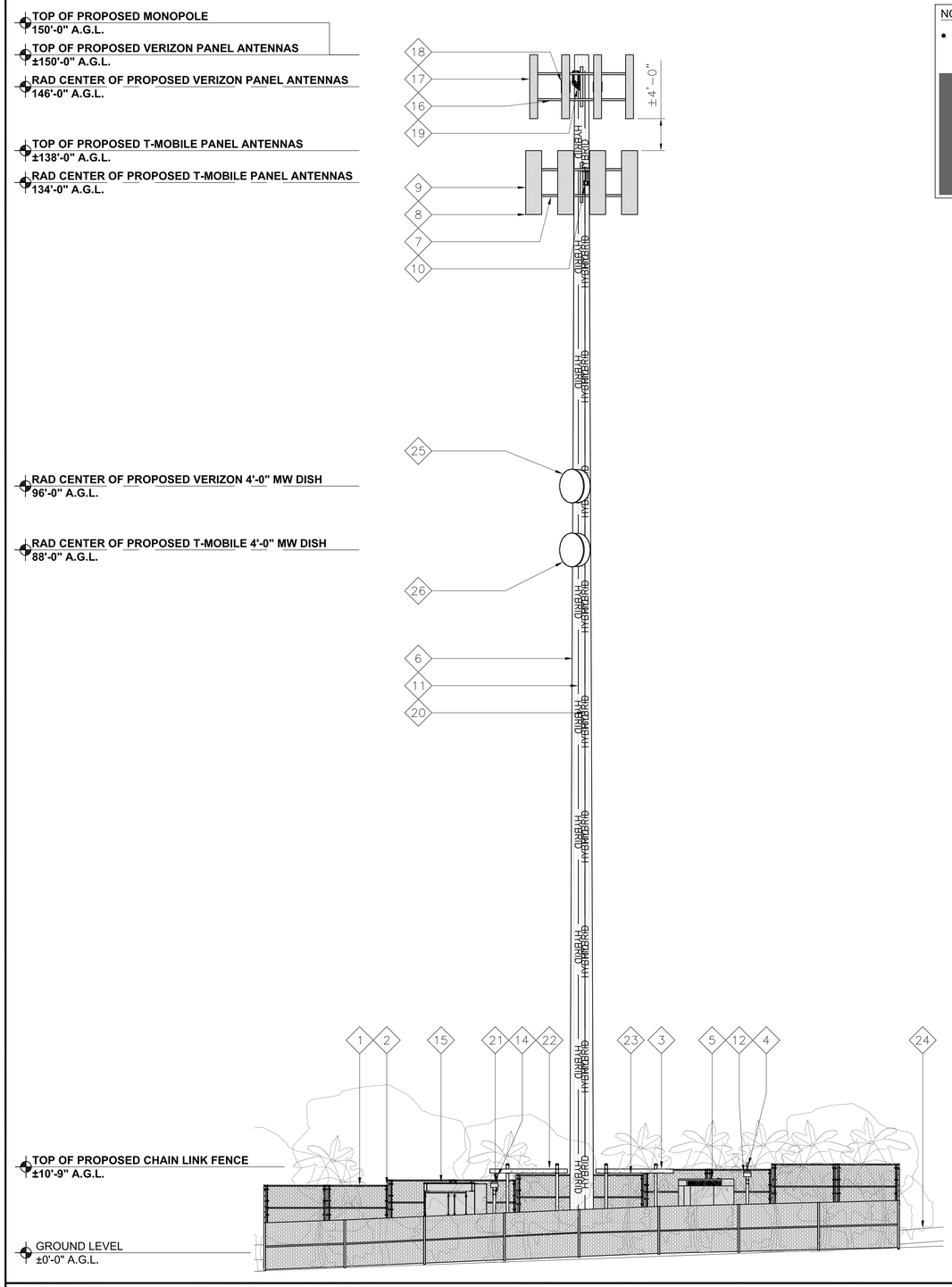
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EQUIPMENT & ANTENNA LAYOUTS

SHEET NUMBER:

A03



NOTE:

- TOWER TO BE PAINTED DUNN-EDWARDS PAINTS (SHAKER GRAY - DE6231).

Dunn-Edwards Shaker Gray (DE6231)

PROPOSED SOUTHEAST ELEVATION

24"x36" SCALE: 1/8" = 1'-0"
11"x17" SCALE: 1/16" = 1'-0"

8' 6' 4' 2' 0' 8'

1

KEYNOTES

1. PROPOSED 36'-0" X 80'-0" EQUIPMENT SPACE
2. PROPOSED 6'-0" HIGH CHAIN LINK FENCE W/ PRIVACY SLATS
3. PROPOSED T-MOBILE ELEVATED 6'-0" TALL CABLE BRIDGE
4. PROPOSED T-MOBILE GPS ANTENNA MOUNTED ON PROPOSED H-FRAME; (1) TOTAL
5. PROPOSED T-MOBILE 48KW ENCLOSED EMERGENCY GENERATOR MOUNTED ON PROPOSED CONCRETE PAD
6. PROPOSED 150'-0" HIGH MONOPOLE W/ SUBTERRANEAN FOUNDATION
7. PROPOSED T-MOBILE T-ARM ANTENNA MOUNT
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12. PROPOSED T-MOBILE POST-MOUNTED WORK LIGHT; (2) TOTAL
13. NOT USED
14. PROPOSED VERIZON GPS ANTENNA MOUNTED ON PROPOSED H-FRAME; (1) TOTAL
15. PROPOSED VERIZON 30KW ENCLOSED EMERGENCY GENERATOR MOUNTED ON PROPOSED CONCRETE PAD
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19. PROPOSED VERIZON OVP SURGE SUPPRESSOR MOUNTED ON PROPOSED T-ARM STANDOFF; (1) PER SECTOR, (3) TOTAL
20. PROPOSED VERIZON HYBRID CABLE ROUTED ALONG ELEVATED 6'-0" TALL CABLE BRIDGE AND INTO TOWER THROUGH OPEN PORT HOLE UP TO ANTENNA LEVEL (±200' TOTAL CABLE LENGTH)
21. PROPOSED VERIZON POST-MOUNTED WORK LIGHT; (2) TOTAL
22. PROPOSED VERIZON ELEVATED 6'-0" TALL CABLE BRIDGE
23. PROPOSED 12'-0" WIDE ACCESS GATE W/ PRIVACY SLATS
24. EXISTING SLOPED SURFACE, TYP.
25. PROPOSED VERIZON 4'-0" MW DISH ANTENNA
26. PROPOSED T-MOBILE 4'-0" MW DISH ANTENNA

RENEGADE TOWERS, LLC
6710 ELVERTON DRIVE
OAKLAND, CA 94611

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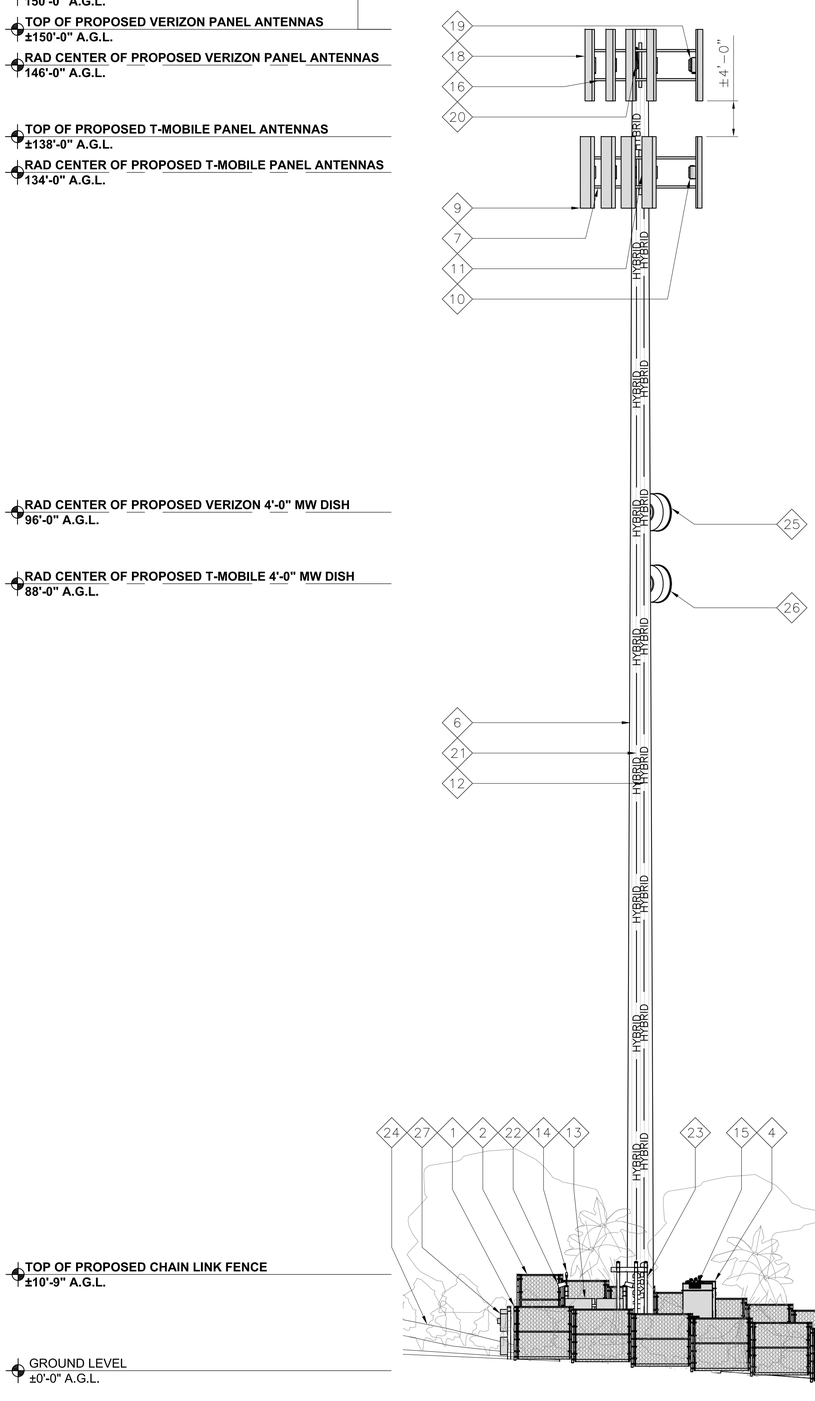
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ELEVATION

SHEET NUMBER:

A04



NOTE:

- TOWER TO BE PAINTED DUNN-EDWARDS PAINTS (SHAKER GRAY - DE6231).

Dunn-Edwards Shaker Gray (DE6231)

PROPOSED SOUTHWEST ELEVATION

24"x36" SCALE: 1/8" = 1'-0"
11"x17" SCALE: 1/16" = 1'-0"
8' 6' 4' 2' 0" 8

1

KEYNOTES

1. PROPOSED 36'-0" X 80'-0" EQUIPMENT SPACE
2. PROPOSED 6'-0" HIGH CHAIN LINK FENCE W/ PRIVACY SLATS
3. NOT USED
4. PROPOSED T-MOBILE 48KW ENCLOSED EMERGENCY GENERATOR MOUNTED ON PROPOSED CONCRETE PAD
5. NOT USED
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11. PROPOSED T-MOBILE SQUID SURGE SUPPRESSOR MOUNTED ON PROPOSED T-ARM STANDOFF; (1) PER SECTOR, (3) TOTAL
12. PROPOSED T-MOBILE HYBRID CABLE ROUTED ALONG CABLE TRAY AND INTO TOWER THROUGH OPEN PORT HOLE UP TO ANTENNA LEVEL (±200' TOTAL LENGTH)
13. PROPOSED VERIZON OUTDOOR UTILITY AND EQUIPMENT ENCLOSURES SECURED TO (N) H-FRAME
14. PROPOSED VERIZON GPS ANTENNA MOUNTED ON PROPOSED H-FRAME; (1) TOTAL
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24. EXISTING SLOPED SURFACE, TYP.
25. PROPOSED VERIZON 4'-0" MW DISH ANTENNA
26. PROPOSED T-MOBILE 4'-0" MW DISH ANTENNA
27. PROPOSED 600 AMP MULTI-METER BANK AND TELCO CABINET ON 6'-0" H-FRAME

RENEGADE TOWERS, LLC
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PROJECT INFORMATION:

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Phone: 702-614-4431; Fax: 702-614-4171
www.aceenvironmentalllc.com

Cultural Resources Review and Field Inspection



Renegade Towers Wireless Site
Kalapana
12-4375 Pahoa Kalapana Road
Pahoa, Hawaii County, Hawaii 96778

ACE project no. 24-464-125-099

June 14, 2024

Prepared for:
Renegade Towers, LLC
6710 Elverton Drive
Oakland, California 94611

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INTRODUCTION

At the request of Ace Environmental, LLC, Scientific Consultant Services (SCS) conducted a cultural resources records search and archaeological site inspection for a proposed 80.0 foot long (NE/SW) by 36.0 foot (2,880.0 square feet; 0.066 acres) wide wireless telecommunications facility and monopole, and 480.0 foot long (E/W) by 16.0 foot wide (7,680.0 square feet; 0.176 acres) access road within the southeast quadrant of TMK: (3) 1-2-007:034 located at 12-4375 Pāhoa-Kalapana Road in Kīkala-Kēōkea Ahupua'a, Puna District, Island of Hawai'i, Hawai'i (Figures 1 through 6). The informal access road is an existing driving lane through Parcel 034. The archaeological site inspection pedestrian survey was conducted on a 0.40-acre area including and surrounding the proposed cellular tower project area (see Figures 3, 4 and 5). The pedestrian survey was larger than the proposed cell tower facility and access road footprint.

The project area occurs at an average 590 feet above mean sea level (amsl) and is bordered to the northwest by Pāhoa-Kalapana Road and the three remaining flanks by currently undeveloped land. The overall Parcel 034 land is undeveloped, consisting of a 32.721-acre property owned by Renegade Towers, LLC.

The cultural resources records search was conducted within a 0.5 mile radius of the proposed tower location to identify historic properties (including archaeological sites, buildings, structures, objects, or districts) listed in or eligible for listing in the regulations implementing Section 106 of the National Historic Preservation Act of 1966, as amended. The Scope of Work is in compliance of Federal statutes for a Federal Communications Commission (FCC) licensing of telecommunications towers.

METHODS

The cultural resources records search was conducted at two State Historic Preservation Division libraries, one located in Hilo, Hawai'i and the other in Kapolei, O'ahu to locate any historic properties on or near lands of the proposed cell tower property. In accordance with Section 106 regulations and HRS §6E-2 Historic Preservation Program definitions, the term 'Historic Property' minimally "means any building, structure, object, district, area, or site … which is over 50 years old." The search included a review of all recorded pre- Contact (prior to 1778) and post-Contact (after 1778) historic properties located within a one-half mile (0.5 mile) radius of the project area.

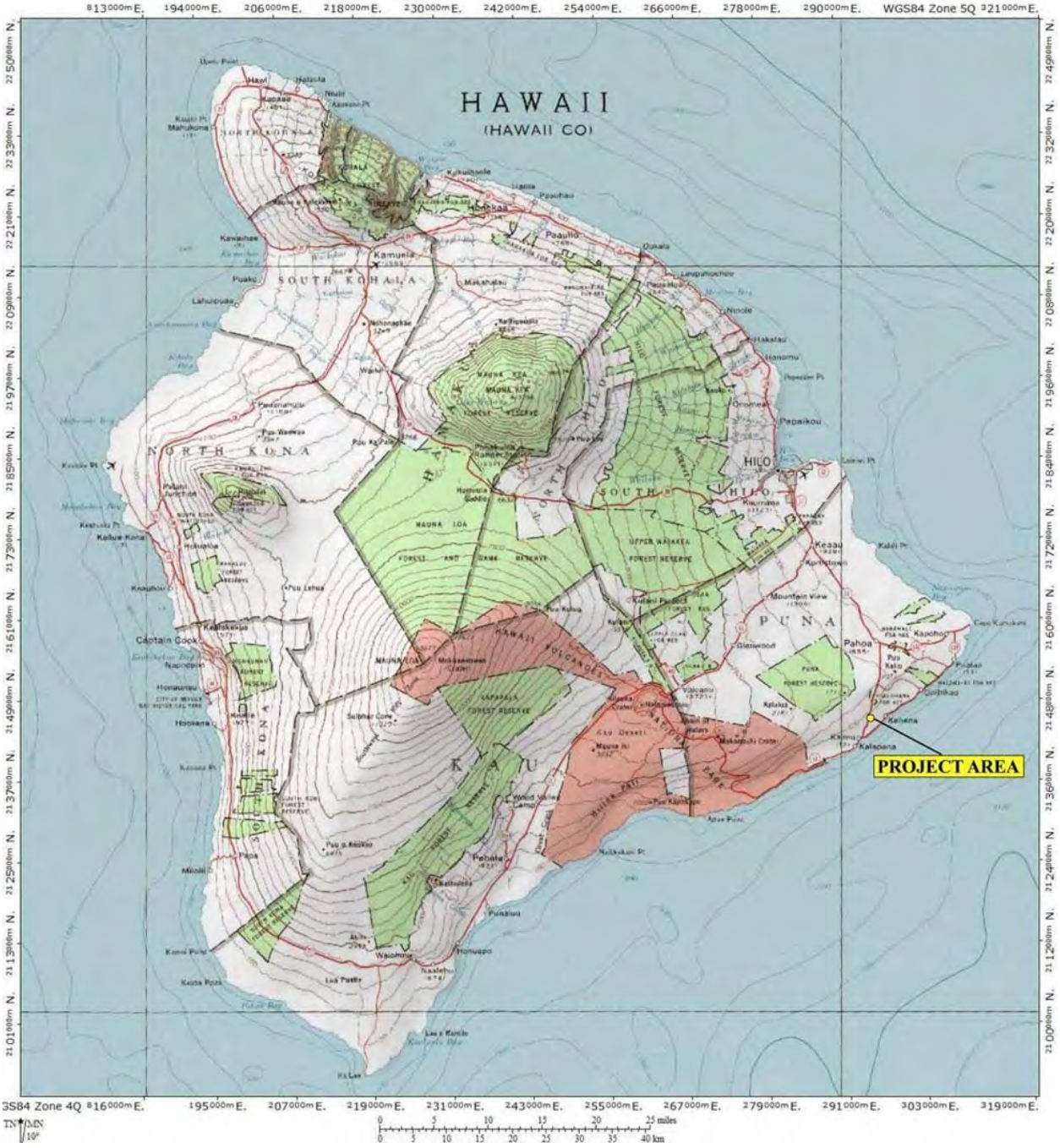


Figure 1: 5,500 K-Series Map of Hawai‘i Showing Location of Project Area (National

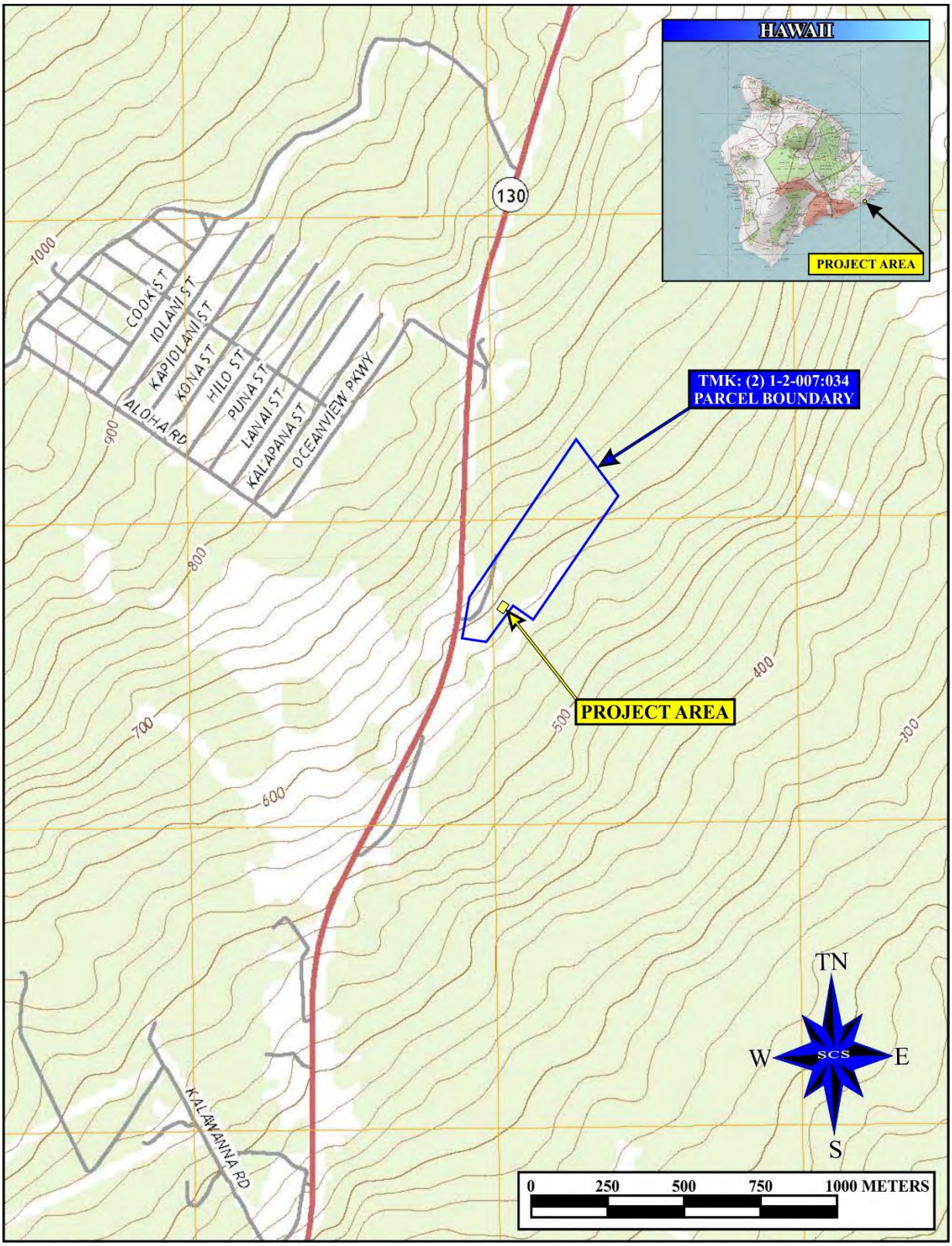


Figure 2: USGS Topographic Map (2017; Kalapana Quad) Showing Location of Parcel 034, Project Area.

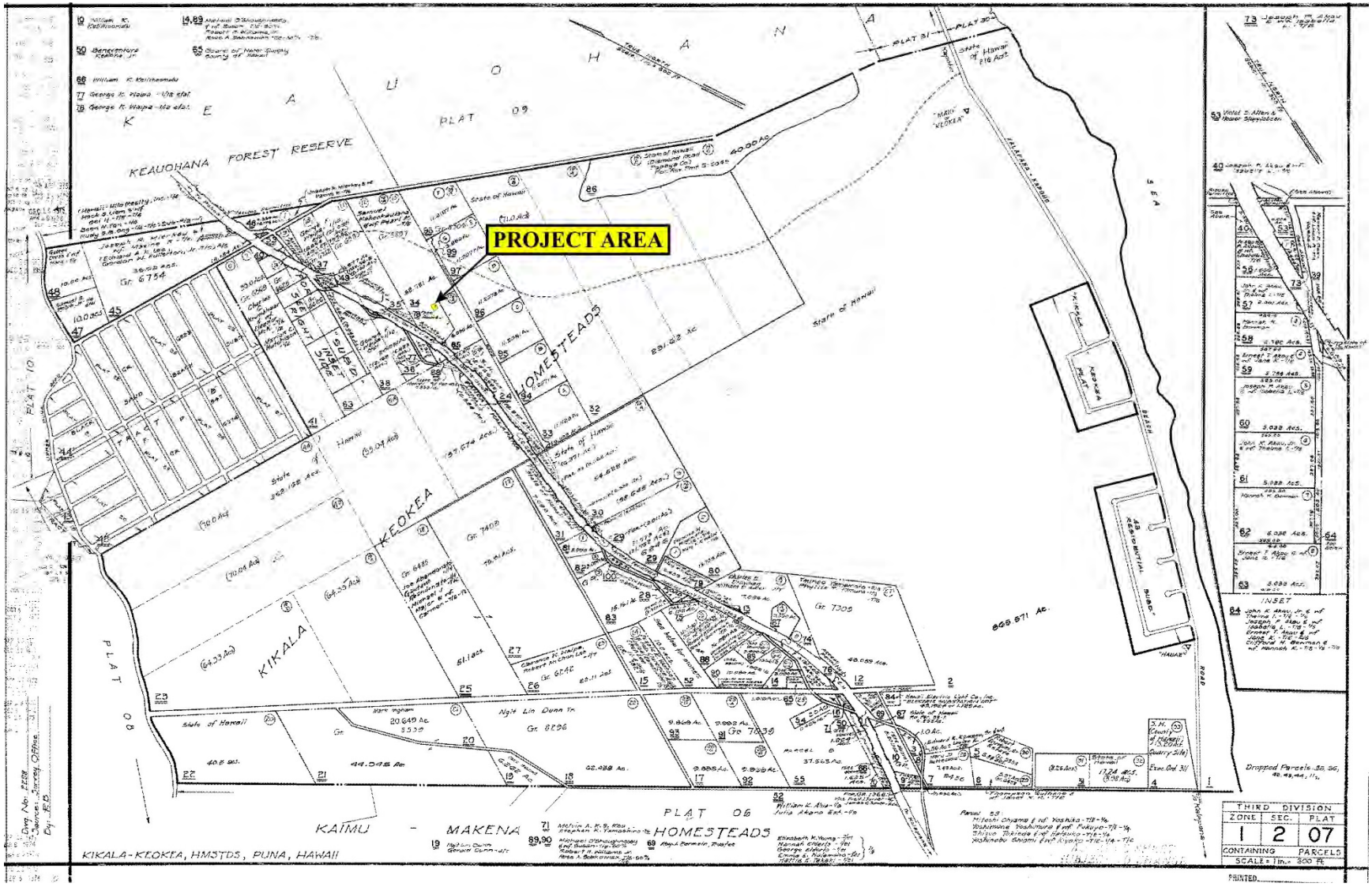


Figure 3: Tax Map Key (TMK) Graphic Showing Project Area Location.



Figure 4: Aerial Photograph Showing Location of Project Area (Google Earth 2024).

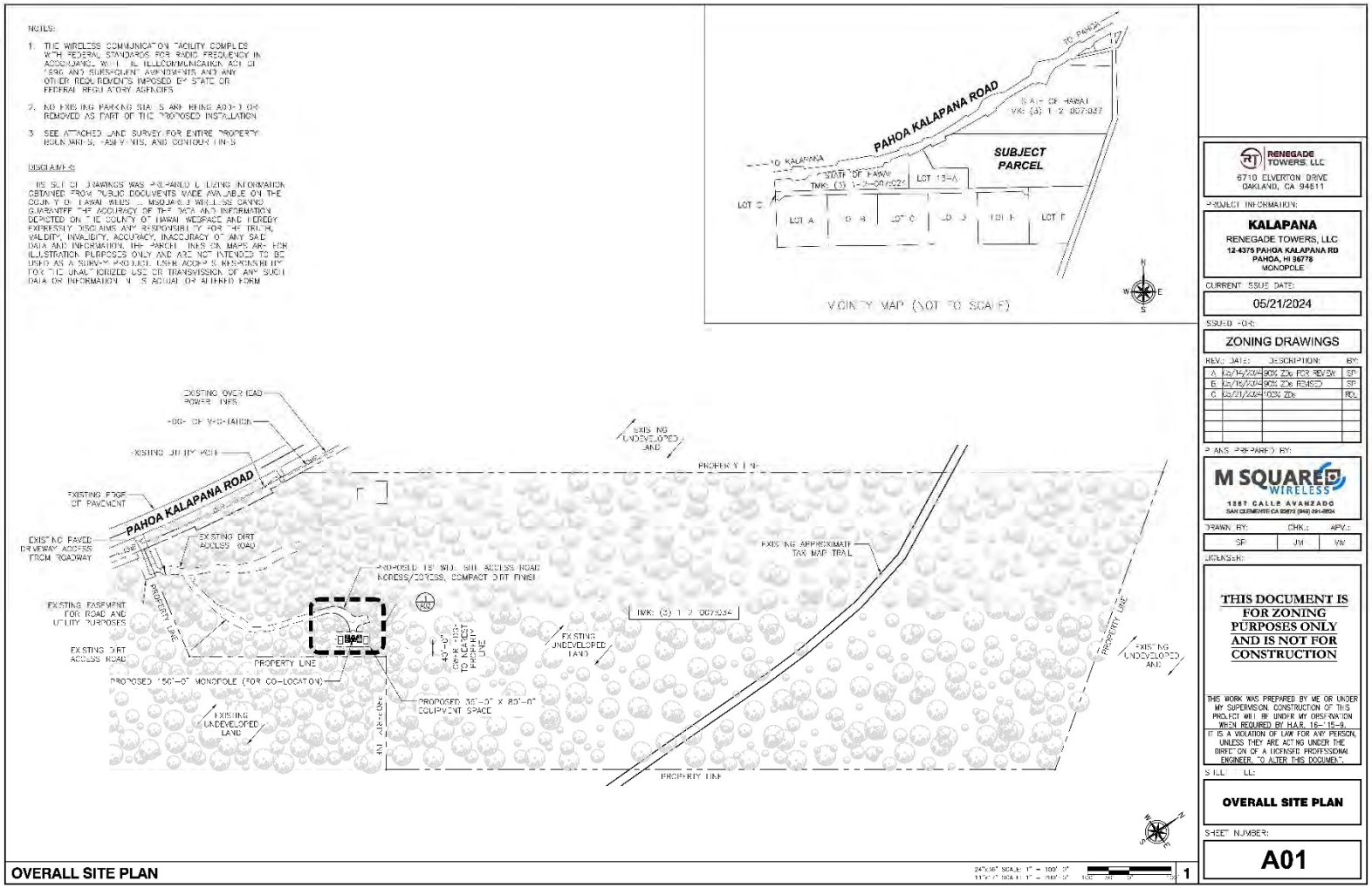


Figure 5: Proposed Facility Plans Showing Existing Driveway, Proposed Cell Tower Facility and Proposed Power Line.

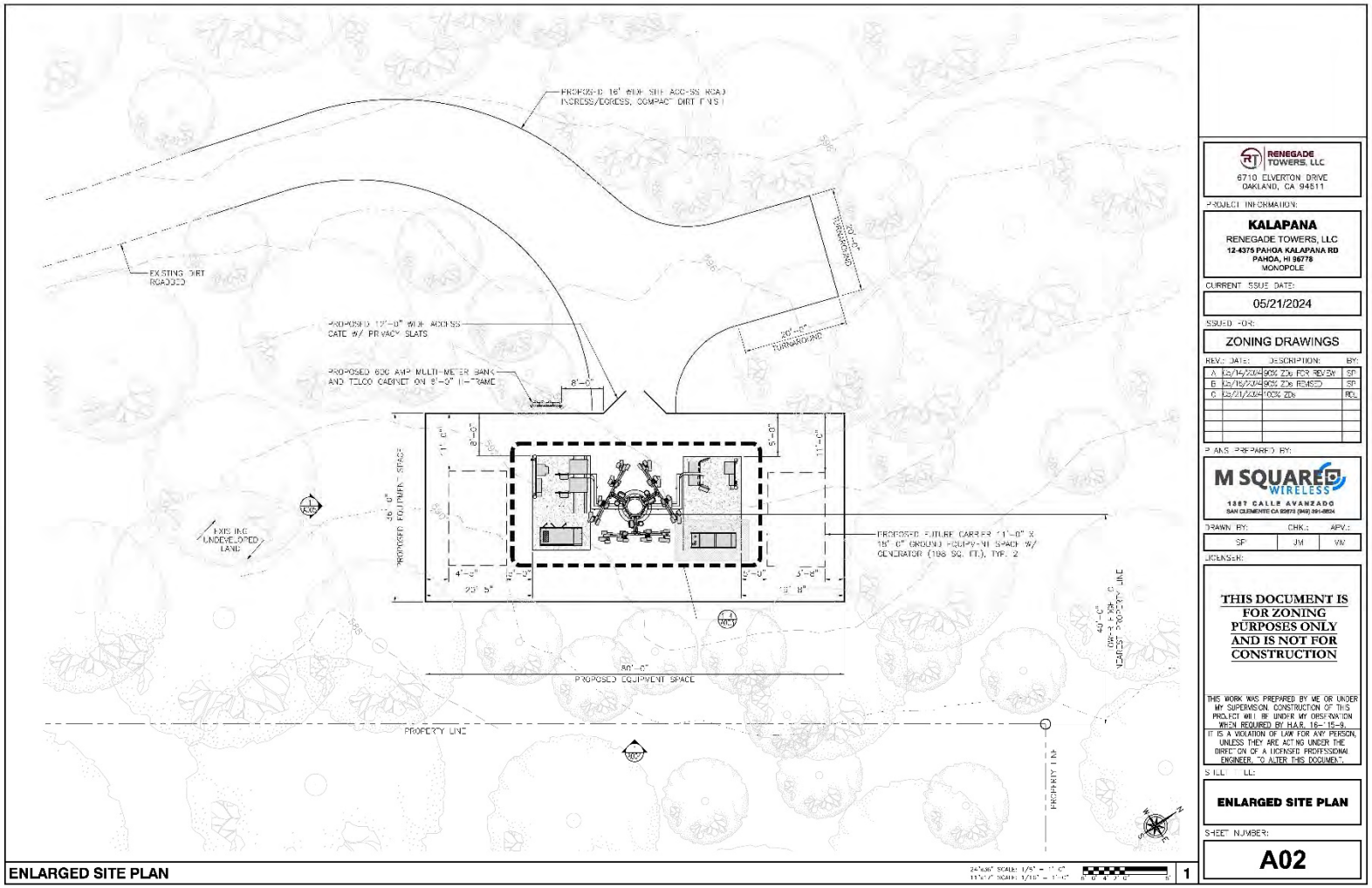


Figure 6: Project Area Site Plan with Access Area.

A search for archaeological reports documenting archaeological resources within the 0.5 mile radius (1320 feet, or 402 meters) of the project parcel, as well as in the general area, are included in this review. In addition, SCS examined the National Register of Historic Places and the Hawai‘i Register of Historic Places to determine whether any registered sites were located within the 0.5 mile radius. The proposed cellular tower site was surveyed by SCS Archaeologist Tess Arriola, B.A., under the direction of project Principal Investigator M. Dega, Ph.D., on June 5, 2024, along with Maya LaGrande, the project biologist. A full 100% pedestrian survey of the project area and surrounding land was completed.

ENVIRONMENTAL SETTING

The project area lies at an average 590 ft. amsl. and is level to gently sloping (to the southeast) land. The ground surface is a Kīlauea lava flow dated between 200 and 400 years before present (Wolfe and Morris (1996). The ‘a‘a lava flow is covered with Malama series extremely stony muck (rMAD Series) (Sato et al.1974:37; Figure 7), although notes on silty clay sediment being present at the surface were noted during the pedestrian survey. Drainage is to the southeast. There are no major drainages or gulches within or near the project area parcel. Annual rainfall in the area is 80 to 120 inches (Giambelluca et al. 2013). Vegetation is primarily introduced fruit trees, ferns and invasive bushes including avocado (Persea Americana), guava (Psidium sp.), mango (Mangifera indica), various palms, Asian melastoma (Melastoma septemnervium), and melochia (Melochia umbellata) (Starr Environmental 2017). The overall appearance of the project area lands is of single canopy with clear open ground surface.

HISTORICAL AND CULTURAL CONTEXTS

Many archaeologists believe that Hawai‘i Island was first settled around A.D. 1000 by people sailing from the Marquesas (Athens et al. 2014; Dye 2011; Kahn et al. 2014; Kirch 2011; Kirch and McCoy 2007; Mulrooney et al. 2011; Rieth et al. 2011; Wilmhurst et al. 2011a and

2011b). An article published in the Journal of Archaeological Science reviewing radiocarbon dates recovered at archaeological sites on the Island of Hawai‘i suggests that by relying on only carbon samples from short-lived plant remains, the most reliable dates point to initial Polynesian colonization of Hawai‘i Island occurring between A.D. 1220 and 1261 (Rieth et al. 2011:2747).



Figure 7: Aerial Photograph of Project Area (Google Earth 2024) and Project Area Soil Series (rMAD series).

The recent studies that included Hawai‘i Island short-lived radiocarbon dating samples assess those recovered exclusively from sites in North Kohala, South Kohala and Hāmākua (Rieth et al. 2011) or from South Point (Ka Lae) in Ka‘ū (Dye 1992; Kirch 2011). Many of the former region sites are rock shelters and the latter are sand dune sites. Sixteen radiocarbon samples from North Kohala, South Kohala and Hāmākua returned conventional radiocarbon ages from 400 to 781 years before present (Rieth et al. 2011:2745). The early date is consistent with ranges of A.D. 1040-1090 and A.D. 1120-1280 from Ka Lae in South Point, Ka‘ū discussed by Kirch (2011:20). All of the samples were recovered from sites in arid environments that have not been disturbed by modern development or human activity. There are no radiocarbon dating samples from Hilo or Puna where there has been a lot of development associated disturbance and where environmental conditions for radiocarbon sample preservation is less favorable.

Historians and ethnographers have long believed that Hilo was one of the first settlements on the Island of Hawai‘i (Handy and Handy 1972:12; Maly 1996:1). The rich marine resources of Hilo Bay and the gently sloping forests of Mauna Loa and Mauna Kea provided abundant resources. Fresh water was available from the Wailoa and Wailuku rivers and smaller streams such as Waiākea, Waiolama, Pukihae, and ‘Alenaio (Maly 1996:1). While there are no streams in Puna, there is enough rainfall so that it sometimes seeps from the ground surface at the coast and collects in small pools.

The project area is located in Kīkala-Kēōkea Ahupua‘a, Puna District, roughly 2.65 kilometers northwest of the Pacific Ocean at Kehena (see Figure 2 and Figure 8). Puna District is located on the eastern tip of Hawai‘i Island and extends from the ocean to the eastern edge of Kīlauea-iki Crater (Halema‘uma‘u) at 4,000 ft amsl and Kūlani cone at 5,518 ft amsl. Puna is translated as well-spring (Matsuoka et al. 1996:33). Kīkala and Kēōkea ahupua‘a were once separate land divisions but were mapped as a single ahupua‘a during the early Historic era. Kīkala-Kēōkea Ahupua‘a. Kēōkea is translated literally as “white sand” and Kīkala is translated literally as “hip” (Pukui et al. 1974:107 and 110).

HISTORIC ACCOUNTS OF PRE-CONTACT ERA PUNA

Historical accounts pertaining to lands of the project area region are scarce but provide some information on traditional residence patterns, land-use, and subsistence. Situated along the windward coast of Hawai‘i Island, Puna is a verdant and abundant district with good rainfall and rich soils. However, it is also subject to volcanic eruptions and has been covered by new lava in many places over the last 1,000 years (Cordy 2000:17, 22). Much of the district's coastal areas have thin soils and there are no good deep water harbors. The ocean along the Puna coast is often rough and wind-blown.

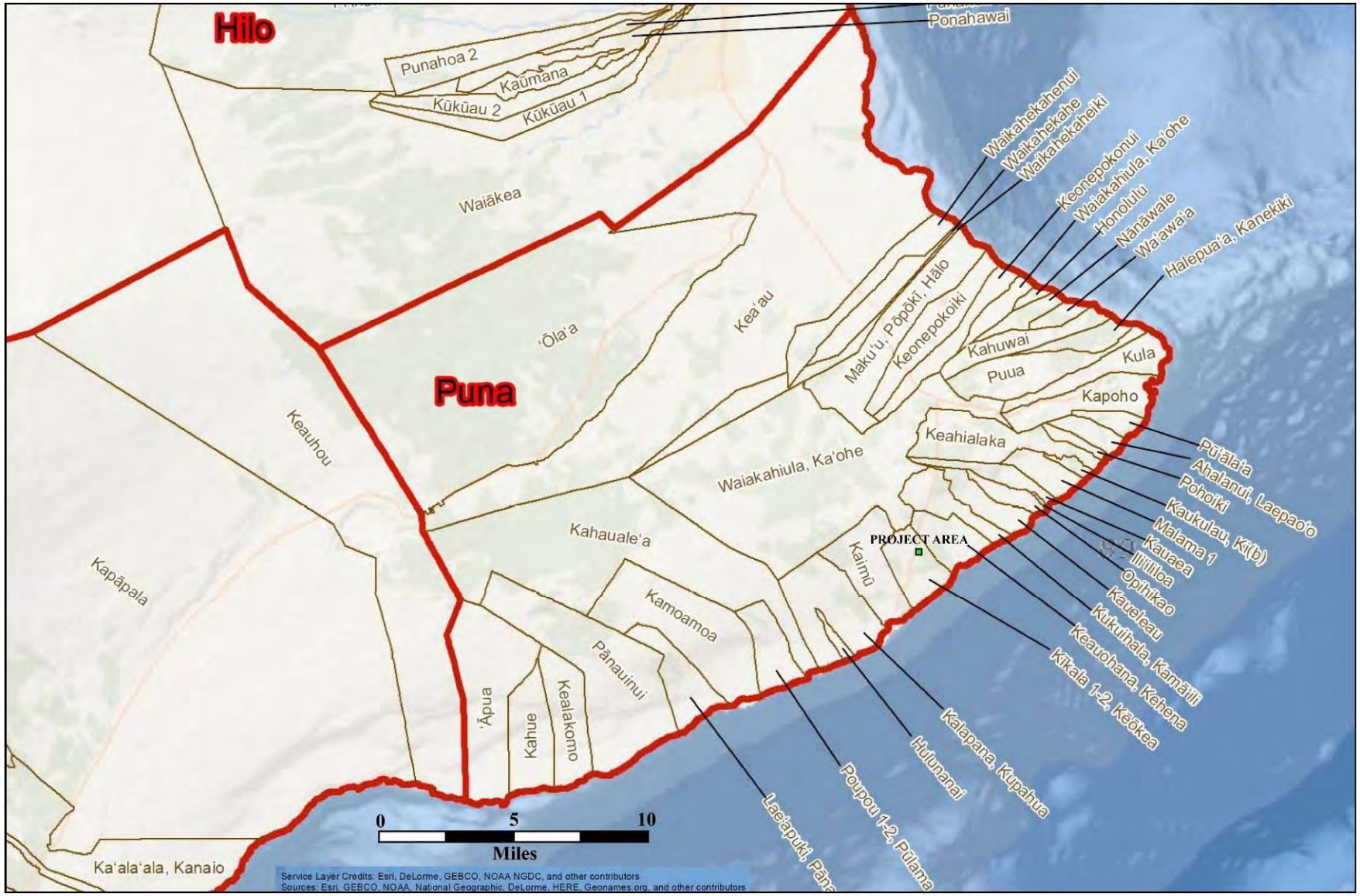


Figure 8: Portion of Hawai'i Ahupa'a Map Showing Puna Ahupua'a.

As a result of these two factors, settlement patterns in Puna tend to be dispersed and without major population centers, this in contrast to North and South Kona, North and South Kona, and Hilo and Hāmākua. Villages in Puna tend to be spread out over larger areas and often are inland, sometimes away from the coast, where the soil is better for agriculture (Cordy 2000: 45). At this time, a strict social hierarchy and a system of kapu (taboo) regulating hierarchical social interactions did not exist.

The lack of population centers had an effect on the development of a hierarchy of district rulers. Puna was often not strongly tied together by a tight web of allegiances between aliʻi and konohiki. As a result, Puna was often conquered and ruled by stronger district leaders in Hilo or Kaʻū (Kamakau 1992:17 and 77; Matsuoka et al. 1996:41).

The earliest written historical accounts of Puna include the arrival of Pāʻao, a priest, prophet, chief and navigator from Tahiti or Samoa. Pāʻao landed in Puna sometime in the 11th century and built his first heiau in Pulama Ahupuaʻa, dedicated to ʻAhaʻula, called Wahaʻula (Thrum 1908:38; Kamakau 1991:100). Wahaʻula was a walled luakini heiau approximately 132 ft by 72 ft with walls that were between eight and ten feet in height. The structure was oriented along the cardinal points of the compass.

Puna District was famous for its valuable products, including "hogs, gray kapa cloth (ʻeleuli), tapas made of māmaki bark, fine mats made of young pandanus blossoms (ʻahuhinalo), mats made of young pandanus leaves (ʻahuao), and feathers of the ʻōʻō and mamo birds" Kamakau 1992:106). Puna was also famous for its abundant ulu (breadfruit).

TRADITIONAL ACCOUNTS (MOʻOLELO) OF PUNA

There are numerous moʻolelo and ʻōlelo noʻeau (proverbs and sayings) that tell of Puna's natural beauty, its gods (akua and aumakua) and places, and its inhabitant's practices. A detailed list and descriptions of akua and aumakua associated with Puna can be found in Uyeoka et al. (2014). Puna is closely associated with Kāne, god of the verdant forests of Puna and the Hawaiian god of sun light, also known as Kāne-i-ka-nohi-o-ka-l (Kāne-in-the-eyeball-of the sun) (Maly 1999:9). Kāne is foremost among the great gods and is associated with procreation, regeneration, the dawn, sunlight, lightning, refreshing spring water, irrigated agriculture, and fishponds (Uyeoka et al. 2014:65-66). Kāne and Lono were the deities most commonly addressed by those who offered prayers for the restoration of any one to health" (Uyeoka et al.2014:72).

One ‘ōlelo no‘eau says “Puna, ka ‘āina i ka haupo o Kāne – the land [held] in the bosom of Kāne (Maly 1999:9). Another says of Puna “Ke one lau‘ena a Kāne – the rich, fertile land of Kāne (Uyeoka et al. 2014:173). Puna is known through traditional oral accounts and proverbs for its groves of pū hala (pandanus trees) with their fragrant clusters of hua hala (pandanus fruit born on the female trees) and the hīnano (blossoms of the male pandanus) (Maly 1999:9).

The traditional oral accounts of early Puna recognize the presence of a volcanic god of fire, called ‘Ai-lā‘au (the devourer of forests) that live within Kīlauea, before the arrival of Pele to the island (Westervelt 1916:1). While ‘Ai-lā‘au lived within Kīlauea, he also inhabited the East Rift Zone craters for a time, before returning to his main residence within Kīlauea. It was there he resided when Pele first arrived.

HISTORIC ACCOUNTS OF CONTACT ERA PUNA

William Ellis passed through Puna in 1823 while travelling along the coastal trail from Kīlauea to Waiākea Ahupua‘a in Hilo (Figure 9). Ellis’ journey took him along the coast near past the coastline below the project area. Ellis’ description of the coast between Kaimū and Kehena Ahupua‘a recounts,

> [At Kaimu], we passed through their plantations, and groves of coconut trees… We had been sitting in the house about an hour, when a small hog, baked under-ground, with some good sweet potatoes, was brought in for dinner, of which we were kindly invited to partake. As there was also plenty of good fresh water here, we found ourselves more comfortably provided for than we had been since leaving Kapapala on Thursday last.
>
> At six o'clock in the evening, we sent to collect the people of the village to hear preaching. Between three and four hundred assembled, under a clump of shady cordia trees, in front of the house, and I preached to them from Psalm xxii. Verses 27 and 28.
>
> In the afternoon, Messrs. Thurston and Bishop walked over to Makena, a pleasant village about a mile to the southward of Kaimu, where they collected about one hundred people, to whom Mr. Thurston preached in one of their houses. A greater number would probably have attended, but for the rain which fell during most of the afternoon. Mr. Bishop numbered the houses in the village, and found them, including Makena, to be 145.
>
> Kaimu is pleasantly situated near the sea shore, on the S. E. side of the island, standing on a bed of lava considerably decomposed, and covered over with a light and fertile soil. It is adorned with plantations, groves of cocoa-nuts, and clumps of kou-trees. It has a fine sandy beach, where canoes may land with safety; and, according to the houses numbered to-day, contains about 725 inhabitants.

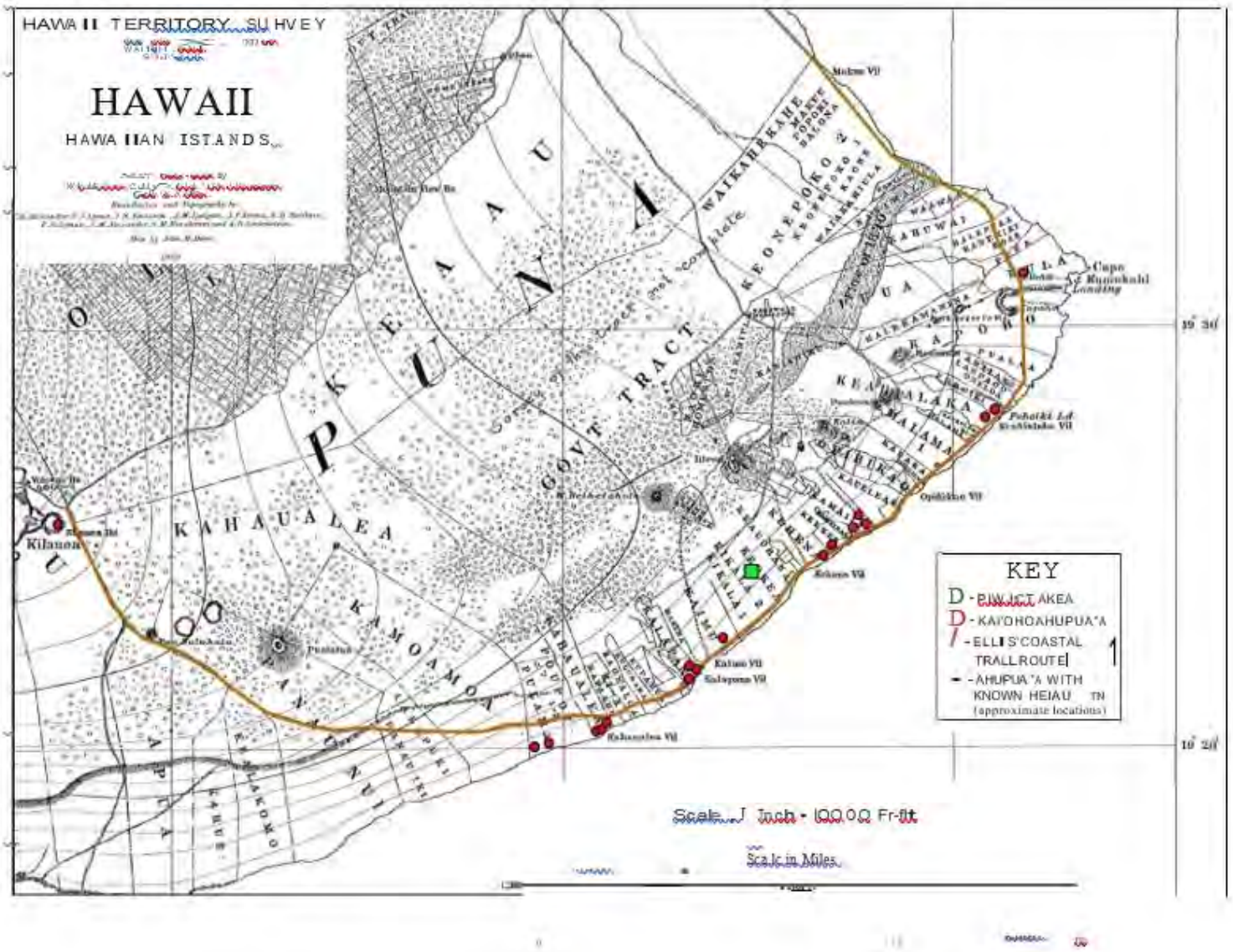


Figure 9: Portion of Hawai 'i Island Map Showing Ellis' Route Along the Puna Coastal Trail, Ahupua'a with Known Heiau, and the Project Area (Donn 1901).

Including the villages in its immediate vicinity, along the coast, the population would probably amount to 2000; and, if water could be procured near at hand, it would form an eligible missionary station.

There are several wells in the village, containing brackish water, which has passed from the sea, through the cells of the lava, undergoing a kind of filtration, and is collected in hollows scooped out to receive it.

The natives told us, that, at the distance of about a mile there was plenty of fresh water.

After travelling nearly two hours, we arrived at Keouohana, where we sat down to rest beneath the shade of some cocoa-nut trees.

Makoa, our guide, spoke to the head man, and he directed the people to collect near his house. About 100 soon assembled, and when we had explained to them in few words, the object of our visit, we requested them to sit down, and listen to the tidings we had brought. They immediately obeyed.

The head man brought us some ripe plantains, of which we ate a few, and then proceeded on our way, leaving them busy in conversation about the news they had heard; which, in all probability, were strange things to their ears.

After travelling a mile and a half along the shore, we came to Kehena, a populous village; the people seemed, from the number of their canoes, nets, &e. to be much engaged in fishing. Their contrivance for launching and landing their canoes, was curious and singular.

The bold coast is formed of perpendicular or overhanging rocks, from forty to sixty feet high, against which, this being the windward part of the island, the swell beats violently.

In one place, where there were a few low rocks about thirty feet from the shore, they had erected a kind of ladder. Two long poles, one tied to the end of the other, reached from these rocks to the top of the cliffs. Two other poles, tied together in the same manner, were fixed parallel to the first two, and about four or five feet distant from them. Strong sticks, eight or ten feet long, were laid across these at right angles, and about two or three inches apart, which being fastened to the long poles with ie, (the tough fibrous roots of a climbing sort of plant, which they find in the woods), formed the steps of this ingenious and useful ladder.

The canoes of the place were light and small, seldom carrying more than one man in each. A number were just landing, as we arrived at the place. Two men went down, and stood close to the water's edge, on the leeward or southern side of the rock.

The canoes were paddled up one at a time. The person in each, then watching a

> convenient opportunity, rowed swiftly to shore, when the rolling billow carried the canoe upon the rock, and it was seized by two men who stood there to receive
>
> it. At the same instant that it was grasped on each side by the men on the rock, the one in the canoe, who steered it, jumped into the sea, swam to the shore, and assisted them in carrying it up the ladder to the top of the cliff, where they placed
>
> it upon curiously carved stools, made of the wood of the erythrina, and returned to the rock to await the arrival of another canoe. In this way five or six were brought up while we stood looking at them, and I took a sketch of their useful contrivance. [Ellis 2004:204-207]

NATIVE TESTIMONY BEFORE THE COMMISSION TO QUIET LAND TITLES

Article IV of the Board of Commissioners to Quiet Land Titles was passed in December 1845 and began the legal process of private land ownership. The Māhele (1848-1850) established a board of five commissioners to oversee land claims and to issue patents and leases for valid claims. Many scholars believe that Kauikeaouli (Kamehameha III) was forced to establish laws in order to protect Hawaiian sovereignty and crown lands from foreigners who had already begun claiming ownership of land they were granted permission to use for homes and business interests (Daws 1968:111; Kame‘eleihiwa 1992: 169-70, 176; Kelly 1983: 45; Kuykendall 1938(1): 145 footnote 47, 152, 165-6, 170). Among other things, the foreigners were demanding private ownership of land to secure their island investments (Kuykendall 1938(1): 138, 145, 178, 184, 202, 206, 271; Kame‘eleihiwa 1992: 178).

As legal statutes defining the Māhele continued to evolve (up to 1850), the lands of the kingdom of Hawai‘i were divided among the king (crown lands), the ali‘i and konohiki, and the government. Once lands were thus divided and private ownership was instituted, the maka`āinana (commoners), if they had been made aware of the procedures, were able to claim the plots on which they had been cultivating and living as stipulated in the Kuleana Act (1849). These claims, however, could not include any previously cultivated or presently fallow land, okipu‘u, stream fisheries, or many other resources traditionally necessary for survival (Kame‘eleihiwa 1992:295; Kelly 1983:45-76; Kirch and Sahlins 1992 vol.1:3, 135-137, and vol.2:2).

The right of claimants to land was based on the written testimony of at least two witnesses who could corroborate the claimant’s long-standing occupation and use of the parcel(s) in question. The claimant was then awarded a patent for the property, subsequently called Land Commission Awards (LCAs) (Chinen 1961:16).

There were no LCAs awarded in Kīkala or Kēōkea Ahupua‘a. The land surrounding the project area was divided into lots and sold as the Kīkala-Kēōkea Homestead Lots. Parcel 034 is a large portion of Lots 12 and 13 (Figure 10).

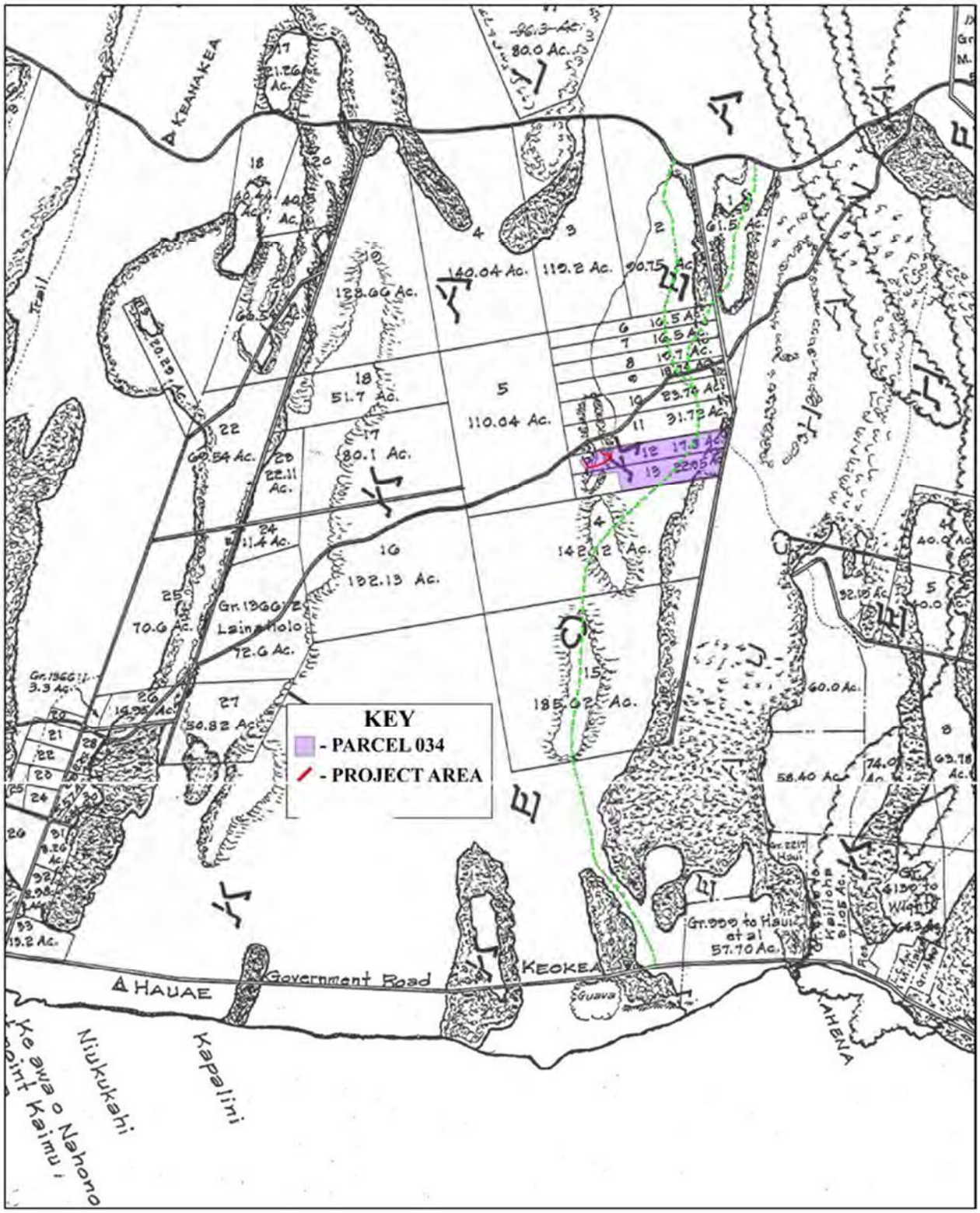


Figure 10: Portion of Puna Forest Reserve Map Showing Kikala-Keokea Homestead Lots, Parcel

POST-CONTACT HISTORY

Between 1845 and 1900, traditional land-use and residential patterns changed drastically. In particular, the regular use of Hilo Bay by foreign vessels, including whaling merchant and inter-island vessel, the growth of tourism, the establishment of missions in the Hilo area, the legalization of private land ownership, the introduction of cattle ranching, the introduction of sugar cane cultivation, and the construction of Government Roads and railroad lines all brought about changes in settlement patterns and long-established land-use patterns (Kelly et al. 1981:111-112).

Much of the change in residential location and the growth of towns in Puna District were driven by the availability of arable land suited to commercial crops and the location of newly constructed roads. Though cattle ranches and commercial sugarcane plantations were established and in large areas of Puna, the project area lands were not, and are far from Historic era commercial centers.

MODERN HISTORY OF THE PROJECT AREA LANDS

Parcel 034 has been privately owned, with three formerly used buildings. The lot was utilized for small scale farming. The buildings were abandoned sometime in the 1980s to 1990s and have collapsed. There is a driveway and secondary road that leads to the remnants of these modern structures.

PREVIOUS ARCHAEOLOGICAL INVESTIGATIONS

There are no previous archaeological studies within a 0.5-mile radius of the current project area. The closest study within Kīkala-Kēōkea Ahupua‘a is 2.5 an archaeological reconnaissance survey (Bevacqua and Dye 1972) km south of the project area, along the coast (Figure 11). A second survey (Sweeney and Burtchard 1995) occurred further away to the northwest. A small number of habitation and agricultural sites have been recorded along the coast in the ahupua‘a (see Bevacqua and Dye 1972). No sites have been recorded within the current project area, a theme that carried through the archaeological field inspection.

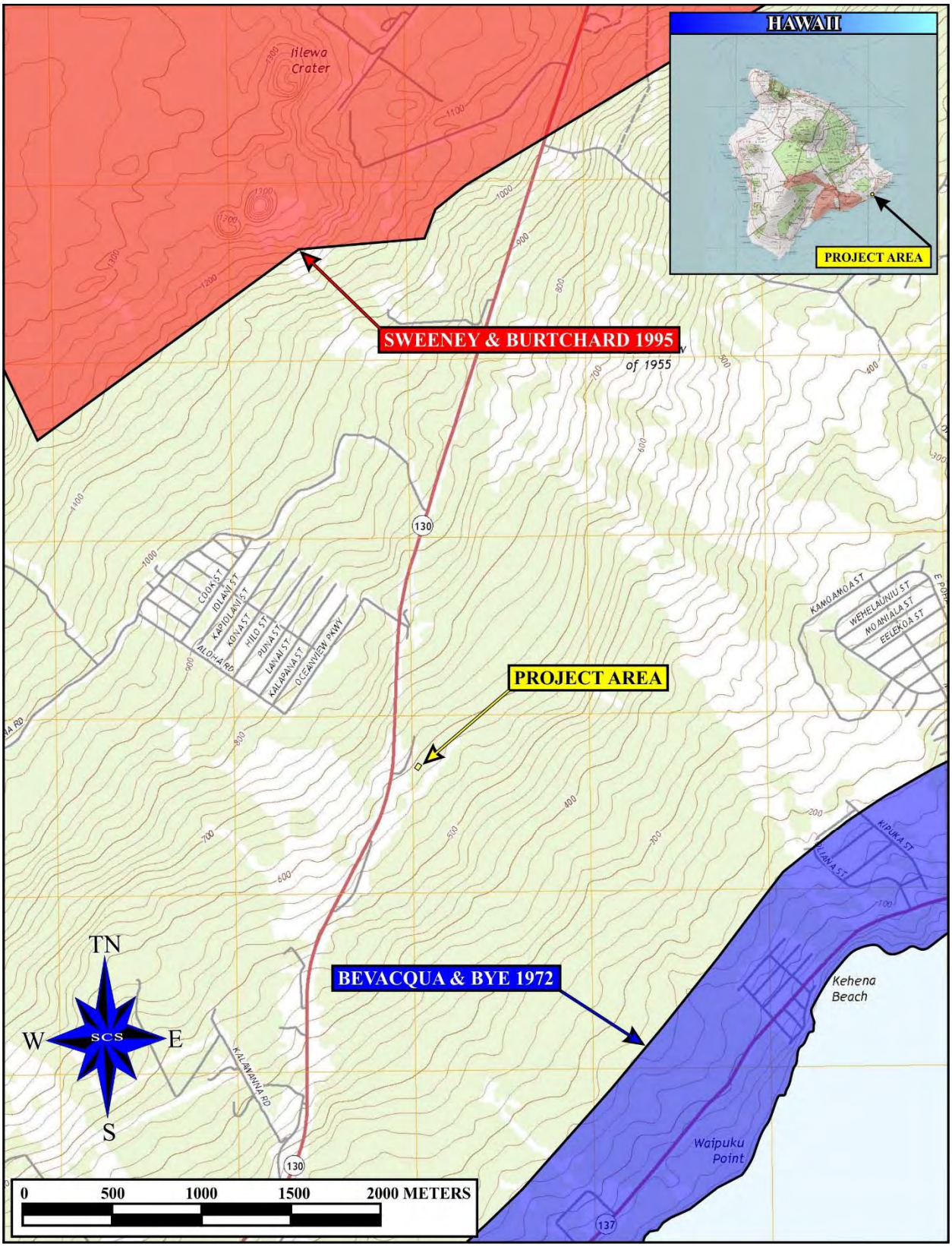


Figure 11: USGS Map (2017) Showing Previous Archaeological Work in the Region.

RECORDS SEARCH RESULTS

The results of the extensive records search indicate that there are no sites listed on the National Register of Historic Places (NRHP) or on the Hawaii Register of Historic Places (HRHP) located within a half mile of the project area. A search was made for previously recorded archaeological sites and architectural structures within the half-mile APE that are eligible for listing on the NRHP and HRHP. Based on the above review of previous archaeological studies, there are no previously recorded sites or structures within the current half-mile APE eligible for listing.

FIELD INSPECTION

On June 5, 2024 SCS archaeologist Tess Arriola, B.A., under the direction of project PI Michael Dega, Ph.D., conducted an archaeological field inspection of the proposed cellular tower facility project area and existing access easement (Figures 12 through 21). The 100% full pedestrian survey was conducted within a larger area surrounding the proposed cellular tower project area and existing access easement road. The existing road will not be impacted by construction of the proposed facility.

The pedestrian survey was conducted via north-south grid sweeps at 5 m intervals (Note: the project biologist was also on site and conducting pedestrian survey together with the SCS worker). Visibility of the surface and surrounding area was good as the area had recently been cleared (no grading or grubbing occurred, just clearing of some overgrown secondary growth vegetation). Notes and photographs of the project area were taken during the survey. Automobile parts were scattered through the project area, with three more complete, abandoned vehicles occurring closer to the roadway on the western flank of the project area. The surface consisted of hard packed silty clay, with a'a lava common across the parcel. Full survey did not reveal the presence of any historic properties inclusive of architectural features, artifacts, or other cultural deposits.

IMPACT ANALYSIS

The archival research and literature search indicate that there are no historic properties located within the 0.5-mile radius of the current project area. The archaeological field inspection conducted by SCS confirmed the absence of any historic properties. As such, there will be no direct impact to any historic properties during the project. There will also be no indirect visual impacts to historic properties from construction of the proposed cellular tower.



Figure 12: Photograph of Existing Driveway and Gate. View to Northeast.



Figure 13: Photograph of Existing Driveway and Gate. View to Southwest.



Figure 14: Photograph of Existing Driveway towards Proposed Cell Site. View to Northeast.



Figure 15: Photograph Overview of Project Area. View to Southwest.



Figure 16: Photographic Overview near Proposed Cell Site. View to Southwest.



Figure 17: Photographic Overview Near Proposed Project Location. View to Southwest.



Figure 18: Photographic Overview Near Proposed Project Location. View to West.



Figure 19: Photographic Overview of Proposed Cell Site Area. View to Northwest.



Figure 20: Photograph of Driveway Leading to Proposed Cell Site. View to South.



Figure 21: Photograph of Abandoned Vehicles near Project Area. View to West.

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Natural Resources Assessment



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ACE project number 24-464-125-099

June 10, 2024

Prepared for:
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INTRODUCTION

This report includes the findings of a plant and animal inventory conducted at the ***revised location*** for the proposed project location for the Kalapana 150-foot high steel monopole with associated panels and equipment at 12-4375 Pāhoa Kalapana Road [TMK: (3) 1-2-007:034], located in the Pāhoa District on the island of Hawai‘i. The previous tower location was surveyed on July 21, 2023 on the same parcel but to the west of the current proposed location. LeGrande Biological Surveys Inc. conducted a literature review and carried out an updated field survey to document resident plant and animal species at the new tower location on the 30th of May 2024 for Ace Environmental LLC. The primary objectives of the literature review and field studies were to:

1) inventory the flora and fauna;
2) provide a general description of the vegetation on the project site;
3) search for threatened and endangered species as well as species of concern; and
4) evaluate the impacts to Threatened & Endangered Species and migratory birds as outlined in the Migratory Bird Treaty Act.

Federal and State of Hawai‘i listed species status follows U.S. Fish and Wildlife (USFWS 2015, 2023).

GENERAL SITE DESCRIPTION

The proposed tower site is located on private property at approximately 590-foot elevation. The area proposed for the monopole and associated equipment is located on a 33 acres lot which is bounded to the north, east, and south by private lands and to the west by Pāhoa-Kalapana Road. The general area is currently characterized by a disturbed ‘ōhi‘a lehua Forest. The project area is populated by two ‘ōhi‘a lehua (*Metrosideros polymorpha*) trees, up to 50 feet in height, scattered sparsely with a variety of dominant non-native tree and shrub species. Soils are classified as Hakuma highly organic hydrous loam [662] (USDA 2024). Uneven pāhoehoe flows covered with organic material and an abundance of cobbles, stones, and boulders scattered along the access road and project site were observed.

RESULTS OF LITERATURE REVIEW

Prior to undertaking the field studies, a search was made of the pertinent literature to familiarize the principal investigator with other plant and animal studies conducted in the general area. An informal IPaC was created (USFWS 2023) to determine the listed plant and animal species with possible ranges within the current project area. The U.S. Fish and Wildlife database (USFWS 2024) was reviewed in order to determine if any Threatened or Endangered plant taxa are known to reside within the study area or in close proximity. The search results were that no known proposed or listed threatened or endangered species are currently known to reside within the project area. Furthermore, no Critical Habitat has been delineated for the site (USFWS 2024). Topographic maps were examined to determine terrain characteristics, access, boundaries, and reference points.

RESULTS OF FIELD SURVEY

Methods

A walk-through survey method was conducted; notes on plants and animals within the proposed cell tower location and surrounding lands within the subject property, along with the access road and any areas that may be affected by construction of the tower. Notes were made on plant associations and distribution, disturbances, topography, substrate types, exposure, drainage, etc. Birds and mammals were identified by sight using the naked eye and Cabela's 10 x 42 binoculars, and by calls, scat, or tracks.

Vegetation

Vegetation is characterized as a highly disturbed ʻōhiʻa lehua (*Metrosideros polymorpha*) forest dominated by non-native plant species. The most prevalent trees are Christmas Berry (*Schinus terebinthifolius*), strawberry guava (*Psidium cattleyanum*), Java plum (*Syzygium cumini*), *Melochia umbellata*, avocado (*Persea americana*), autograph tree (*Clusia rosea*), and mango (*Mangifera indica*). Trees reached up to 50 feet in height, with the tallest being the two ʻōhiʻa lehua. At the edges of the project area the introduced common staghorn fern (*Platycerium bifurcatum*) was observed growing in several of the trees. Scandent shrubs, ferns, and vines observed in the understory included; lauaʻe (*Microsorum grossum*), Asian swordfern (*Nephrolepis brownii*), kī (*Cordyline fruticosa*), *Blechnum appendiculatum*, sourbush (*Pluchea carolinensis*), and *Christella parasitica*. Other weedy shrubs and herbs included comb hyptis (*Mesosphaerum pectinatum*), broad-leaved plantain (*Plantago major*), milkwort (*Polygala paniculata*), Spanish needle (*Bidens pilosa*), partridge pea (*Charmaecrista nictitans*), *Sida* spp., rattlepod (*Crotalaria spp.*), Koster's curse (*Miconia crenata*), *Dissotis rotundifolia*, broomsedge (*Andropogon virginicus*), lantana (*Lantana camara*), tick clover (*Grona triflora*), Phillipine ground orchid (*Spathoglittis plicata*), and Chinese ground orchid (*Phaius tankarvilleae*).

Species observed along the proposed access road included grasses such as, Bermuda grass (*Cynodon dactylon*), basket grass (*Oplismenus hirtellus* subsp. *hirtellus*), natal redtop (*Melinis repens*), Guinea grass (*Megathyrsus maximus*), Hilo grass (*Paspalum conjugatum*), and smutseed (*Sporobous africanus*). The highly invasive false ʻawa (*Piper auritum*) was observed growing near the abandoned vehicles to the west of the project area. Few native species were observed other than the endemic ʻōhiʻa lehua trees. Two indigenous species, the Pākahakaha fern (*Lepisorus thunbergianus*) observed occassionally growing epiphytically in trees and ʻuhaloa (*Waltheria indica*) shrubs were scattered in open areas.

Birds

Five species of non-native birds were observed or heard during the survey. Warbling white-eye (*Zosterops japonicus*) and Zebra doves (*Geopelia striata*) were the most prevalent followed by House finch (*Haemorhous mexicanus*), Nothern Cardinal (*Cardinalis cardinalis*), and Yellow-billed Cardinal (*Paroaria capitata*). None of the bird species observed during the survey of the project area were native.

Although native `io or Hawaiian hawk (*Buteo solitarius*) were not observed during the survey at the immediate project area, one hawk was observed flying over the Pāhoa Kalapana Road as we left the survey area. The project area harbors a few trees, namely the ʻohiʻa lehua, of heights that the hawks may select for roosting or nesting.

Mammals

Numerous signs, scat and tracks, of feral pigs (*Sus scrofa*) were observed at the project area. No other mammals were observed within the property, but no doubt one or more rodents found on Hawaiʻi Island, European house mice (*Mus musculus domesticus*), roof rat (*Rattus r. rattus*), brown rat (*Rattus norvegicus*), or possibly Polynesian rats (*Rattus exulans hawaiiensis*) use various resources found within the general project area. Feral cats (*Felis catus*) and mongoose (*Urva auropunctata*) most likely also utilize the general area for foraging. All of these introduced species are deleterious to native ecosystems and the native faunal species dependent on them.

DISCUSSION & RECOMMENDATIONS

The survey area is dominated by non-native trees and shrubs. The biological resources of the area have been altered by construction of roads, housing, and most impactfully, the introduction of invasive plant and animal species. None of the plant or animal species observed on the project site is listed as a threatened, endangered, or a species of concern (USFWS 2024; Wagner et al. 1999). None of the listed Endangered species (one mammal, seven birds, and eleven plants) provided by the informal IPaC were located during the survey (USFWS 2023). No sensitive or otherwise regulated habitats (e.g., wetlands, Critical Habitat) were found on the project site (USFWS 2024b). The following are recommendations for the protection of possible rare taxa that could potentially be effected by habitat alteration at the project site and continued use as a telecommunicaiton facility.

Hawaiian Hawk

The Hawaiian Hawk or `Io has been delisted as Endangered by Federal agencies (USFWS 2020) but is still listed by the State of Hawaiʻi as Endangered. The hawks can be found from sea level to above 8,990 feet (Pyle and Pyle 2009). Hawaiian Hawks construct their nests approximately 2 months before laying eggs. Nest trees range from 32 to 79 feet in height and the nests are typically located 11 to 60 feet above the ground. Nests are constructed on stable platforms such as on the top of birds-nest ferns or crotches within the branches of the trees (Griffin 1998). Although no hawks were observed during the survey at the project site itself, one hawk was seen flying over the Pāhoa Kalapana Road as we exited the access road. It is a possibility that hawks may untilize the taller trees within the project area for roosting or nesting.

The following measures are recommended prior and during construction to avoid impacts to the Hawaiian Hawk:

- A nest survey is recommended of the immediate area around the construction site during the Hawk breeding season (March through September) at least 10 days prior to start of construction. The survey should be conducted by a qualified biologist using appropriate

survey methods and should focus on the large trees that could provide nesting habitat (Gorressen et al 2008, USFWS 2008)

- If active nest(s) are located, no construction should occur within 1600 feet of the nest until the chicks fledge or the nest is abandoned.
- If Hawaiian Hawk individuals are detected in the area during construction, all activities within 100 feet of the bird should cease. Work may continue when the bird has left the area on its own.

Hawaiian Hoary Bat

Listed Endangered Hawaiian hoary bats, or *ʻōpeʻapeʻa* (*Lasiurus semotus*) (Pinzari et al. 2020), are known to occur from sea level to upper elevations across a wide range of relatively undisturbed and highly modified habitats, and may roost in both native and introduced tree species (Mitchell et al 2005). The potential for bats to collide with cell towers is considered to be negligible largely because such structures are immobile and should be readily detectable by the bat's echolocation. No bats have been found to have collided with guyed meteorological towers in forested areas known to harbor bat populations (SWCA 2010, 2011). In accordance with current USFWS guidance, pre-construction clearing of vegetation higher that 15 ft. in stature should be prohibited from June 1 to September 15 to help ensure that non-volant bat pups are not harmed by land clearing activities. Barbed wire should not be used in order to limit entanglement.

Seabirds

It is possible that the endangered Hawaiian Petrel (*Pterodroma sandwichensis*), Band-rumped Storm-Petrel (*Hydrobates castro*), and the threatened Newell's Shearwater (*Puffinus newelli*) over-fly the project area between April and the middle of December each year in small numbers. (The most current names for all avian species following: AOU Check-List of North and Middle American Birds 2021, and the 63rd supplement to the checklist (Chesser et al., 2021, 2022). The primary cause of mortality in Hawaiian Petrels, Newell's Shearwaters and Band-rumped Storm-Petrels in Hawaiʻi is thought to be predation by alien mammalian species at the nesting colonies (USFWS, 1983; Simons and Hodges, 1998; Ainley et al., 2001). Collision with man-made structures is considered the second most significant cause of mortality of these seabird species in Hawaiʻi. Nocturnally flying seabirds, especially fledglings on their way to sea in the summer and fall, can become disoriented by exterior lighting. Disoriented seabirds may collide with man-made structures and, if not killed outright, become easy targets of opportunity for feral mammals (Hadley, 1961; Telfer, 1979; Sincock, 1981; Reed et al., 1985; Telfer et al., 1987; Podolsky et al., 1998; Ainley et al., 2001; Hue et al., 2001). No suitable nesting habitat exists within or close to the PA for any of these three seabird species.

The principal potential impact that current habitat modifications or changes pose to protected seabirds is an increased threat that birds will be downed after becoming disoriented by lights. Two ways outdoor lighting can pose a threat to nocturnally flying seabirds is if: 1) during construction it is deemed expedient or necessary to conduct night-time construction activities; or, 2) following build-out, security lighting is operated during the seabird nesting season.

- If night-time construction activity or equipment maintenance is proposed during any construction phases of the project, all associated lights should be shielded, and

when large flood/work lights are used, they should be placed on poles that are high enough to allow the lights to be pointed directly at the ground (Reed et al., 1985; Tellfer et al., 1987). Deleterious impacts to transiting seabirds can be avoided if construction occurs during daylight hours and all outdoor lighting installed is fully "dark sky compliant" (HDLNR-DOFAW, 2016). DLNR recommends avoiding construction-related night-time lighting between September 15 and December 15 (DLNR, 2016).

Habitat for the State listed nēnē or Hawaiian Goose (*Branta sandvicensis*) is not present in or around the project site. No host plants for the State listed Blackburn's Sphinx Moth (*Manduca blackburni*) were observed in or around the project area.

Rapid Ohia Death (ROD)

Two ʻōhiʻa lehua trees are located at the project area. If any ʻōhia lehua trees are slated for trimming or removal the following discussion describes prevention of ROD spread: A recently documented fungal disease, *Ceratocystis*, killing native ʻōhiʻa trees is prevalent on Hawaiʻi Island. The College of Tropical Agriculture and Human Resources (CTAHR) provide practices to help prevent the spread of the fungus to new trees or populations. The recommendations include; Avoiding injuring ʻōhiʻa, not moving wood or other parts of the tree locally or inter-island; cleaning gear and tools, including shoes and clothes, before and after entering work areas; and washing tires, and machinery to remove all soil and mud. For futher information visit: https://cms.ctahr.hawaii.edu/rod/

Critical Habitat

There is no USFWS Critical Habitat (habitat designated to support recovery of listed species) designated within the survey area at present (USFWS 2024b). The proposed installation of a new 150-foot-tall tower, equipment building, and access roadway would result in vegetation clearance at the build site and along the access roadway and is not expected to impact listed native vegetation as none were located within the vicinity during the current surveys.

Guidelines for communication towers

The tower and additional equipment should follow the guidelines outlined in the USFWS Guidelines for Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning (USFWS 2021). https://www.fws.gov/sites/default/files/documents/usfws-communication-tower-guidance.pdf

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Appendix: Site Photographs



Figure 1. Gated access road leading to proposed cell tower site.



Figure 2. Entrance roadway looking west towards Pāhoa Kalapana Road.



Figure 3. Beginning of access road is slightly overgrown and proceeds along the right fork.

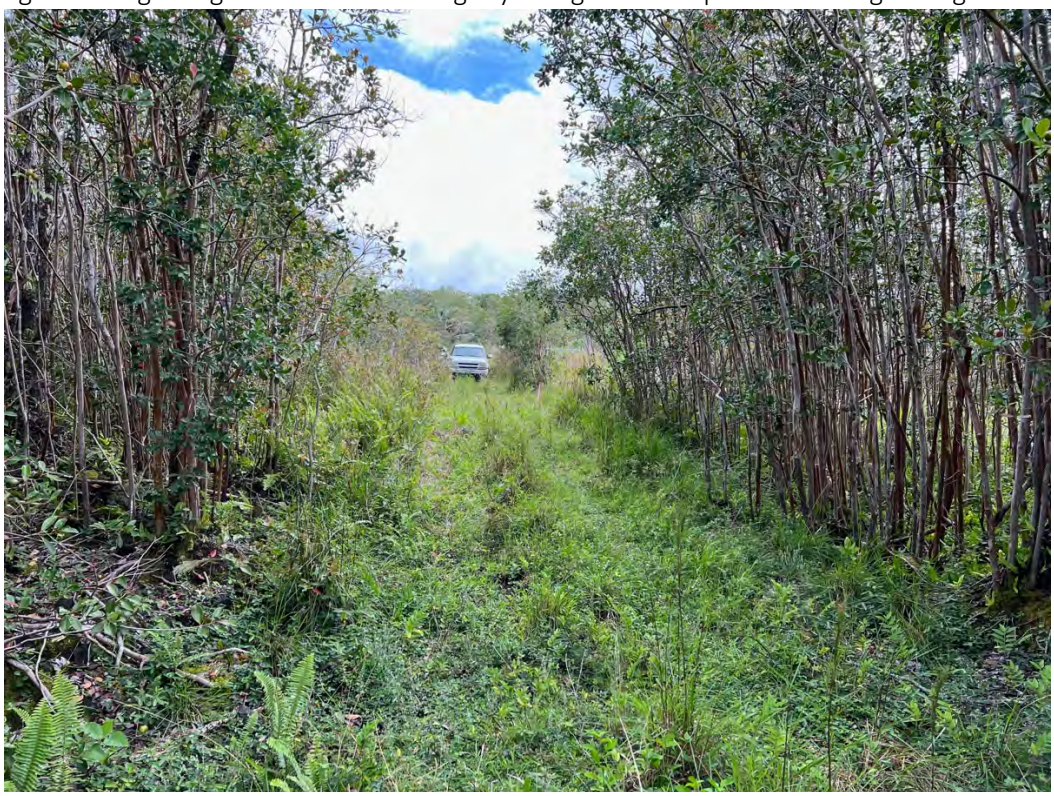


Figure 4. Access road lined with strawberry guava. Build site is to the right after the stand of guava.



Figure 5. View of build site looking northeast with scrub vegetation and ʻōhia lehua trees.



Fig 6. Tallest tree is ʻōhiʻa lehua approximately 40 feet tall.



Figure 7. Looking north in vicinity of build site.



Figure 8. Abandoned vehicles near the proposed access road.

JOSH GREEN, M.D.
GOVERNOR OF HAWAII
KE KIA'AINA O KA MOKU'AINA O HAWAI'I

KENNETH S. FINK, M.D, MGA, MPH
DIRECTOR OF HEALTH
KA LUNA HO'OKELE

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 916
HILO, HAWAII 96721-0916

MEMORANDUM

DATE: September 26, 2024

TO: Mr. Zendo Kern
Planning Director, County of Hawaii

FROM: Eric Honda
District Environmental Health Program Chief

SUBJECT: Use Permit Application (PL-USE-2024-000028)
Applicant: Renegade Towers, LLC Request: To Establish a Multi-Carrier Telecommunication Facility with a 150-Foot-Tall Monopole Tower and Related Equipment
Tax Map Key: (3) 1-2-007:034 (por.) Kalapana, Puna, Hawai'i

In most cases, the District Health Office will no longer provide individual comments to agencies or project owners to expedite the land use review and process.

Agencies, project owners, and their agents should apply Department of Health "Standard Comments" regarding land use to their standard project comments in their submittal. Standard comments can be found on the Land Use Planning Review section of the Department of Health website: https://health.hawaii.gov/epo/landuse/. Contact information for each Branch/Office is available on that website.

Note: Agencies and project owners are responsible for adhering to all applicable standard comments and obtaining proper and necessary permits before the commencement of any work.

General summary comments have been included for your convenience. However, these comments are not all-inclusive and do not substitute for review of and compliance with all applicable standard comments for the various DOH individual programs.

Clean Air Branch

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

Planning Dept.
Exhibit 2

2. Control of Fugitive Dust: You must reasonably control the generation of all airborne, visible fugitive dust and comply with the fugitive dust provisions of HAR §11-60.1-33. Note that activities that occur near existing residences, businesses, public areas, and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies and mitigates all activities that may generate airborne and visible fugitive dust and that buffer zones be established wherever possible.
3. Standard comments for the Clean Air Branch are at: https://health.hawaii.gov/epo/landuse/

Clean Water Branch

1. All project activities shall comply with the HAR, Chapters 11-53, 11-54, and 11-55.
    1. The following Clean Water Branch website contains information for agencies and/or project owners who are seeking comments regarding environmental compliance for their projects with HAR, Chapters 11-53, 11-54, and 11-55: https://health.hawaii.gov/cwb/clean-water-branch-home-page/cwb- standard-comments/.

Hazard Evaluation & Emergency Response Office

1. A Phase I Environmental Site Assessment (ESA) and Phase II Site Investigation should be conducted for projects wherever current or former activities on site may have resulted in releases of hazardous substances, including oil or chemicals. Areas of concern include current and former industrial areas, harbors, airports, and formerly and currently zoned agricultural lands used for growing sugar, pineapple or other agricultural products.
2. Standard comments for the Hazard Evaluation & Emergency Response Office are at: https://health.hawaii.gov/epo/landuse/.

Indoor and Radiological Health Branch

1. Project activities shall comply with HAR Chapters 11-39, 11-45, 11-46, 11-501, 11-502,
11-503, and 11-504.
2. Noise may be generated during demolition and/or construction. The applicable maximum permissible sound levels, as stated in Title 11, HAR, Chapter 11-46, "Community Noise Control," shall not be exceeded unless a noise permit is obtained from the Department of Health.
3. Construction/Demolition Involving Asbestos: If the proposed project includes renovation/demolition activities that may involve asbestos, the applicant should contact the Asbestos and Lead Section of the Branch at https://health.hawaii.gov/irhb/asbestos/.

Safe Drinking Water Branch

1. Agencies and/or project owners are responsible for ensuring environmental compliance for their projects in the areas of 1) Public Water Systems; 2) Underground Injection Control; and 3) Groundwater and Source Water Protection in accordance with HAR Chapters 11-19, 11-20, 11-21, 11-23, 11-23A, and 11-25. They may be responsible for fulfilling additional requirements related to the Safe Drinking Water program: https://health.hawaii.gov/sdwb/.
2. Standard comments for the Safe Drinking Water Branch can be found at: https://health.hawaii.gov/epo/landuse/.

Solid & Hazardous Waste Branch

1. Hazardous Waste Program - The state regulations for hazardous waste and used oil are in HAR Chapters 11-260.1 to 11-279.1. These rules apply to the identification, handling, transportation, storage, and disposal of regulated hazardous waste and used oil.
2. Solid Waste Programs - The laws and regulations are contained in HRS Chapters 339D, 342G, 342H, and 342I, and HAR Chapters 11-58.1 and 11-282. Generators and handlers of solid waste shall ensure proper recycling or disposal at DOH-permitted solid waste management facilities. If possible, waste prevention, reuse, and recycling are preferred options over disposal. The Office of Solid Waste Management also oversees the electronic device recycling and recovery law, the glass advanced disposal fee program, and the deposit beverage container program.
3. Underground Storage Tank Program – The state regulations for underground storage tanks are in HAR Chapter 11-280.1. These rules apply to the design, operation, closure, and release response requirements for underground storage tank systems, including unknown underground tanks identified during construction.
4. Standard comments for the Solid & Hazardous Waste Branch can be found at: https://health.hawaii.gov/epo/landuse/.

Wastewater Branch

For comments, please email the Wastewater Branch at doh.wwb@doh.hawaii.gov.

Sanitation / Local DOH Comments:

1. According to HAR §11-26-35, No person, firm, or corporation shall demolish or clear any structure without first ascertaining the presence or absence of rodents that may endanger public health by dispersal from such premises. Should any such inspection reveal the presence of rodents, the rodents shall be eradicated before demolishing or clearing the structure. A demolition permit is required prior to demolition.

Other

1. CDC - Healthy Places - Healthy Community Design Checklist Toolkit recommends that state and county planning departments, developers, planners, engineers, and other interested parties apply these principles when planning or reviewing new developments or redevelopment projects.

2. If new information is found or changes are made to your submittal, DOH reserves the right to implement appropriate environmental health restrictions as required. Should there be any questions on this matter, please contact the Department of Health, Hawaii District Health Office, at (808) 933-0917.

Mitchell D. Roth
Mayor

Benjamin T. Moszkowicz
Police Chief

Reed K. Mahuna
Deputy Police Chief

County of Hawai`i

POLICE DEPARTMENT
349 Kapi'olani Street • Hilo, Hawai'i 96720-3998
(808) 935-3311 • Fax (808) 961-2389

September 27, 2024

COH PLANNING DEPT
SEP 30 2024 PM12:31

REC'D HAND DELIVERED

TO : ZENDO KERN, PLANNING DIRECTOR

FROM : KENNETH A.K. QUIOCHO, ASSISTANT POLICE CHIEF
AREA I OPERATIONS BUREAU

SUBJECT: USE PERMIT APPLICATION (PL-USE-2024-000028)
APPLICANT: RENEGADE TOWERS, LLC
REQUEST: TO ESTABLISH A MULTI-CARRIER TELECOMMUNICATION FACILITY WITH A 150-FOOT-TALL MONOPOLE TOWER AND RELATED EQUIPMENT
TAX MAP KEY: (3) 1-2-007:034 (POR.) KALAPANA, PUNA, HAWAI'I

Staff, upon reviewing the provided documents, does not anticipate any significant impact to traffic and/or public safety concerns.

Thank you for allowing us the opportunity to comment.

If you have any questions, please contact Captain Todd Pataray, Puna Patrol, at 965-2716 or via email at Todd.Pataray@hawaiicounty.gov.

Planning Dept.
Exhibit 3